



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGIONS 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

AUG 22 2006

REPLY TO THE ATTENTION OF:

D-8J

Mr. Joseph M. Reidy  
Schottenstein, Zox and Dunn Co., LPA  
250 West Street  
Columbus Ohio 43215-2538

RE: Former Columbus Coated Fabrics Facility in Columbus, Ohio  
OHD 004 294 351

Dear Mr. Reidy:

I am writing in response to your July 3, 2006, letter addressed to Mr. Eaton Weiler concerning the former Columbus Coated Fabrics ("CCF") facility. That letter requested that the U.S. EPA provide written confirmation that it would accept the regulatory steps outlined in the Ohio EPA's May 17, 2006, letter, which you had enclosed. My response is based upon the facts currently known to the United States Environmental Protection Agency ("U.S. EPA") Waste, Pesticides and Toxics Division, is provided for informational purposes, and addresses Region 5's intentions under the Resource Conservation and Recovery Act ("RCRA") only.

Our records indicate that U.S. EPA Region 5 issued a RCRA permit to this facility on September 27, 1984, which expired on October 24, 1994, after Region 5 had acknowledged Columbus Coated Fabric's closure certification and supporting documentation. The letter acknowledging closure, dated August 26, 1994, stated that

"...upon expiration of the Federal Part B permit on October 27, 1994, CCF will be removed from the universe of permitted facilities. CCF will be considered and regulated as a Large Quantity Generator of hazardous waste."

The letter also cautioned that the approval did not release CCF from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management units, regardless of the time at which waste was placed in the unit.

Based on the Ohio EPA's May 17, 2006, letter, we understand that in recognition of the unique circumstances surrounding the former CCF site, and in order to achieve effective and expeditious corrective action, the Ohio EPA intends have the facility owner accomplish corrective action through the MOA-Track Voluntary Action Program ("VAP"). The remediation to be conducted under the VAP will address contamination at



the site related to releases from the RCRA solid waste management units. Closure of RCRA-regulated storage/treatment units will be performed before or concurrently with the VAP-related cleanup.

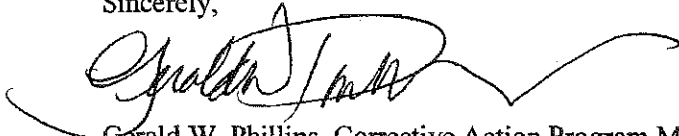
The U.S. EPA supports state programs to address contaminated facilities. We also support the regulatory strategy described in the Ohio EPA's May 17, 2006, letter. The Agency is in the process of developing a Memorandum of Agreement with the Ohio EPA, similar to those already in place with several other states, recognizing that state voluntary cleanup programs may provide appropriate mechanisms to achieve RCRA corrective action. Consistent with those ongoing discussions with Ohio EPA, as of the date of this letter, U.S. EPA neither plans nor anticipates taking action under federal authority as long as the outstanding RCRA corrective action obligations for this facility will be addressed and overseen by Ohio EPA in compliance with the VAP. U.S. EPA's position is based on: (1) the information in your July 3, 2006, letter, (2) the regulatory strategy described in the May 17 Ohio EPA letter (3) the specific circumstances and history of this site, and (4) other information available to us. In addition, the U.S. EPA will rely on the Ohio EPA to resolve any current or future RCRA closure activities associated with this facility. Please note, however, that the above representations do not preclude the U.S. EPA from undertaking any action at the facility at a later date if: (1) Ohio EPA requests that U.S. EPA provide assistance in the performance of a response action or information provided by Ohio EPA indicates that the facility is not making progress under the VAP, that the facility has not continued to meet the standards or conditions of its No Further Action letter from Ohio EPA, or that corrective action is necessary for releases that were not disclosed during the VAP process; (2) U.S. EPA determines that contamination has migrated or is likely to migrate onto property subject to the jurisdiction, custody, or control of a department, agency, or instrumentality of the United States and may impact the authorized purposes of the federal property; (3) After considering the response activities already taken at the facility, U.S. EPA determines that the facility may present an imminent and substantial endangerment to public health or welfare or the environment; (4) Ohio EPA fails to respond in a timely manner to a known situation where institutional controls, engineering controls, land use restrictions, or other conditions placed on a property as required by Ohio EPA are no longer protective of public health or the environment, given the current conditions at the property, except where inconsistent with CERCLA § 128 ; or (5) the facility owner or operator fails to implement a course of action required by Ohio EPA.





If you have any questions, or if we can be of any further assistance, please do not hesitate to contact me at 312-886-0977 or Mr. Gary Victorine at 312-886-1479.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald W. Phillips", with a long, sweeping horizontal line extending to the right.

Gerald W. Phillips, Corrective Action Program Manager  
Waste, Pesticides and Toxics Division

cc: Dave Sholtis OEPA  
Amy Yersavich OEPA  
Craig Butler OEPA-CDO  
Kevin Lyskowski, DOJ  
Eaton Weiler, R5-ORC  
Tom Krueger, R5-ORC  
George Hamper, R5-WPTD  
Hak Cho, R5-WPTD



**BORDEN PACKAGING and INDUSTRIAL PRODUCTS**

DOMESTIC AND INTERNATIONAL  
DIVISION OF BORDEN, INC.



November 20, 1992

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Donald R. Schregardus, Director  
Ohio EPA  
1800 Water Mark Drive, Box 1049  
Columbus, OH 43266-0149  
ATTEN: Mr. Thomas Crepeau, Manager  
Data Management for DSHWM

Mr. Valdas Adamkus, Regional Administrator  
U.S. EPA, Region 5 HRP-8  
77 West Jackson Blvd.  
Chicago, IL 60604  
ATTEN: Harriet Croke, Chief of Ohio Permitting  
Section, RCRA Permitting Branch

Re: Hazardous Waste Container Storage Area Closure  
Columbus Coated Fabrics  
1280 North Grant Avenue  
Columbus, Ohio 43201  
Latitude: 39 degrees 59 minutes 33 seconds  
Longitude: 82 degrees 59 minutes 43 seconds  
U.S. EPA ID# OHD 004 294 351  
Ohio EPA ID# 01-25-0145

Dear Mr. Crepeau and Ms. Croke:

Columbus Coated Fabrics (CCF) was issued a final RCRA permit for hazardous waste container storage at its Columbus, Ohio facility by U.S. EPA on September 27, 1984. The permit application included a closure plan dated September 30, 1982 with revisions dated November 21, 1983.

CCF submitted a revised Part B Permit application to the Ohio EPA and U.S. EPA on November 21, 1990. The Ohio EPA reviewed the revised application pursuant to the rules published in the Ohio Administrative Code - Hazardous Waste Facility Standards Chapters and the corresponding Federal Regulations. The Agency's completeness/technical adequacy review of the revised application was reported in a letter to CCF dated March 3, 1991.

In lieu of resubmitting the Part B Permit application, on May 23, 1991 Columbus Coated Fabrics provided notice that it intended to cease handling hazardous waste in a manner which requires a Hazardous Waste Facility Permit. In other words, CCF will close its hazardous waste container storage area and store its hazardous waste containers for less than ninety (90) days. With this change in status, Columbus Coated Fabrics requests withdrawal of its Ohio EPA Part A hazardous waste facility permit and withdrawal of its U.S. EPA RCRA hazardous waste permit.

The Closure Plan included in the Permit application was updated in order to comply with Ohio EPA's new closure plan review guidance issued May 1, 1991. CCF submitted to the Ohio EPA and U.S. EPA a revised Closure Plan for its hazardous waste container storage area on January 13, 1992. This plan was approved by the Ohio EPA on April 17, 1992 and by the U.S. EPA on August 3, 1992. Two copies of CCF's approved Closure Plan are enclosed in accordance with Ohio Rule 3745-50-47.

The Certification of Closure of Hazardous Waste Container Storage Area (HWCSA) was submitted to the Ohio EPA and U.S. EPA on November 17, 1992. Two copies of the Certification of Closure are enclosed in accordance with Ohio Rule 3745-50-47.

**BORDEN HOME WALLCOVERINGS**

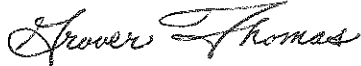
1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43201 • TELEPHONE 614-297-6035 • FAX 614-297-2999



November 20, 1992

If you have any questions or require additional information, please contact Grover Thomas at 614/297-6097 or Scott Fennell, P.E. of T.M. Gates, Inc. (consultant) at 513/248-1025.

Sincerely,

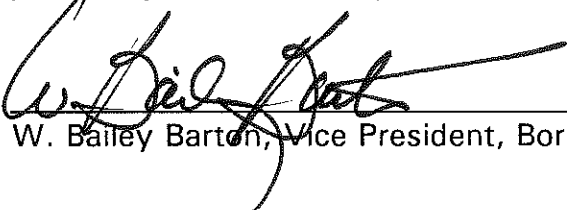


Grover Thomas,  
Environmental Manager  
**COLUMBUS COATED FABRICS**

GT/rap  
encl.

**Certifications**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
W. Bailey Barton, Vice President, Borden Inc.

November 20, 1992  
Date

cc: Andrew Kubalak, Ohio EPA

Brent Kinnan, Borden, Inc. - Law Dept.  
Rick Springer, Borden, Inc. - Health & Envir.  
John Sykes, Borden, Inc. - Columbus Coated Fabrics  
Grover Thomas, Borden, Inc. - Columbus Coated Fabrics



RECEIVED DEC 22 1992  
WMD RCRA  
RECORD CENTER *Para A*

*Steve*

AUG 3 1992

HRP-8J

C. Richard Springer, Manager  
Environmental Affairs  
Borden Packaging and Industrial Products  
Division of Borden, Inc.  
1050 Kingsmill Parkway  
Columbus, Ohio 43229-1143

RE: Class 1 Permit Modification Request  
Columbus Coated Fabrics Facility  
Columbus, Ohio  
OHD 004 294 351

Dear Mr. Springer:

The United States Environmental Protection Agency (U.S. EPA) has received your Class 1 permit modification request, dated June 22, 1992, for a modification to the closure plan contained in Attachment VI. of your Federal Resource Conservation and Recovery Act (RCRA) permit.

Your modification request is hereby approved. The modified pages of your closure plan are enclosed. Replace Section 13.iv(g) and (h), with Table 2 of the revised State of Ohio closure plan, and replace the Closure Schedule, Figure 12, page 107 with Figure 4 of the State of Ohio closure plan. The facility must comply with all appropriate permit modification requirements under Title 40 Code of Federal Regulations 270.42 for a Class 1 permit modification.

If you have questions, please contact Stephen Bouchard of my staff, at (312) 886-7569.

Sincerely,

Karl E. Bremer, Chief  
RCRA Permitting Branch

Enclosure

cc: Ed Lim, OEPA-CO (w/o Attachment)  
Tom Crepeau, OEPA-CO (w/o Attachment)  
Andrew Kubalak, OEPA-CO





POB  
07/31/92

487/31/92

CONCURRENCE REQUESTED FROM RPB			
OTHER STAFF	RPB STAFF	RPB SECTION CHIEF	RPB BRANCH CHIEF
Him 7/30	DP/MSB 7/31/92	DP 7/31/92	KEB 8/3/92



BORDEN PACKAGING and INDUSTRIAL PRODUCTS  
DOMESTIC AND INTERNATIONAL  
DIVISION OF BORDEN, INC.



C. RICHARD SPRINGER  
MANAGER—ENVIRONMENTAL  
ENVIRONMENTAL AFFAIRS

RECEIVED

JUL 7 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

June 22, 1992

Mr. Valdas Adamkus  
Regional Administrator  
U.S. EPA - Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Attn.: HRP-8J

Re.: Part B Permit Modification  
Columbus Coated Fabrics Facilities  
Columbus, Ohio  
OHD 004 294 351

RECEIVED

JUL 02 1992

U.S. EPA  
OFFICE OF REGIONAL ADMINISTRATOR

Dear Mr. Adamkus:

We are herein requesting a Class 1 modification of the Part B Permit for the above referenced facility. Specifically, we request that the Closure Plan (Revision October, 1990) included in the permit be modified by the closure plan (Revision January 13, 1992) included with this submission. It should be noted that in a letter dated April 17, 1992, the Ohio EPA has already approved the modified closure plan.

As identified in the U.S. EPA letter dated May 8, 1992, changes between the permit closure plan and the modified closure plan are described below. (Topic headings correspond to those in the permit closure plan.)

(i) General Information

The permit plan specifies a date of 2050 for hazardous waste container storage area and facility closure under the assumption that the unit would be used for permitted storage (i.e., >90 days) for the duration of facility operations. However, as previously stated, the hazardous waste container storage area will be closed in 1992 (pending agency approval), while waste generating operations are expected to continue.



Letter to Mr. V. Adamkus  
June 22, 1992  
Page Two

(iv) Inventory Removal and Disposal or Decontamination of Equipment

The permit plan specifies numerous hazardous waste disposal/recycling facilities and transporters. The modified plan provides an updated list. These facilities are permitted by the appropriate hazardous waste agencies.

(v) Schedule for Closure

Both plans specify 180 days to complete closure. The modified plan specifies that the clock will start after approval of the Director of OEPA. This will be modified by letter to specify schedule start after receiving both U.S. EPA and OEPA approval.

A proposed letter modifying the OEPA approved closure plan is enclosed. If OEPA has no objections to the proposed modifications, hazardous waste container storage area closure will be initiated upon receipt of your favorable reply to this permit modification request.

If I can provide any additional information to aid in your review, please do not hesitate to contact me or Rick Spencer of T.M. Gates, Inc. at (513) 248-1025.

Sincerely,

*C. R. Springer*

C. R. Springer

CRS:ckb

Encl.

cc: Mr. Andrew Kubalak, OEPA, CDO  
Mr. Tom Crepeau, OEPA, CDO  
Mr. Steve Roth, OEPA, CDO  
Ms. Lisa Pierard, U.S. EPA, Region 5  
Mr. Joel Morbito, U.S. EPA, Region 5  
Mr. Steve Bouchard, U.S. EPA, Region 5



# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



January 15, 1992

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

David A. Ullrich, Director  
Waste Management Division, H-7J  
U.S. Environmental Protection Agency  
Region V  
77 W. Jackson Blvd.  
Chicago, IL 60604

RE: Borden, Inc., Columbus Coated Fabrics

Dear Mr. Ullrich:

Pursuant to 40 C.F.R. Section 270.42, Borden, Inc., Columbus Coated Fabrics ("permittee" or "CCF") hereby notifies the Director concerning a Class I modification to its Part B RCRA Hazardous Waste Permit.

The permittee has modified its Contingency Plan to designate a new Emergency Coordinator and alternatives. The new Emergency Coordinator is:

George Rusincovitch, Techn. Mgr./Chief Eng. Emerg. Coord.  
6987 Eastview Drive  
Columbus, OH 43085

non-responsive

Office Phone: 614/297-6122

and the alternatives are:

Wayne Judy, Plant Manager  
1158 Forest Glen Road  
Westerville, OH 43081

non-responsive

Office Phone: 614/297-6104

Jim Weaver, Director of Manufacturing  
8606 Finlarig Drive  
Dublin, OH 43017

non-responsive

Office Phone: 614/297-6127

Richard Miller, Manager of Safety/Security  
4808 Woodstream Court  
Gahanna, OH 43230

non-responsive

Office Phone: 614/297-6078

Joe Ochwat, Maintenance Superintendent  
6456 Cherokee Rose Drive  
Westerville, OH 43081

non-responsive

Office Phone: 614/297-6113





January 15, 1992

(alternatives con't.)

Dan Schaaf, Supv. & Chief of the Emergency Squad  
277 Orchard Lane  
Sunbury, OH 43074

non-responsive

Office Phone: 614/297-6098

Grover Thomas, Environmental Manager  
86 Spring Hollow Lane  
Westerville, OH 43081

non-responsive

Office Phone: 614/297-6097

Glenn Myres, Manager of Engineering  
2712 Central Park Place  
Columbus, OH 43231

non-responsive

Office Phone: 614/297-6045

Ken Greene, Supv. Tooling & Chrome Plating Dept.  
2460 E. Orange Road  
Galena, OH 43021

non-responsive

Office Phone: 614/297-6095 &  
614/297-6115

Mike Betts, General Manager  
2258 Sawbury Blvd.  
Worthington, OH 43085

non-responsive

Office Phone: 614/297-6068

John Sykes, Environmental Coordinator  
1224 Slade Avenue  
Columbus, OH 43235

non-responsive

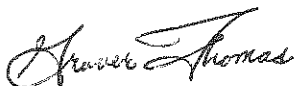
Office Phone: 614/297-6043

This modification is necessary in order to allow CCF to maintain an updated list of Emergency Coordinators.

Additionally, CCF made several minor administrative, organizational and grammatical changes to the Contingency Plan. The purpose of the changes is to maintain an updated and organized Contingency Plan.

The U.S. EPA has been sent a copy of the amended Contingency Plan reflecting these changes.

Very truly yours,



Grover Thomas,  
Environmental Manager  
**COLUMBUS COATED FABRICS**

GT/rap



## COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

David A. Ullrich, Director  
Waste Management Division, H-7J  
U.S. EPA, Region V  
77 W. Jackson St.  
Chicago, IL 60604

RECEIVED  
DEC 24 1991

U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

Re: Borden, Inc., Columbus Coated Fabrics

Dear Mr. Ullrich:

Pursuant to 40 CFR & 270.42, Borden, Inc., Columbus Coated Fabrics ("permittee" or "CCF") hereby notifies the Director concerning a Class I modification to its Part B RCRA Hazardous Waste Permit.

The permittee has modified its Waste Analysis Plan to delete all references to Stilson Laboratories and to insert in place of Stilson Laboratories "an independent laboratory" capable of performing appropriate analytical methodologies. This modification is necessary in order to allow CCF to send samples for analysis according to the requirements of CCF's RCRA Permit to an independent laboratory instead of Stilson Laboratories.

Please contact me at 614/297-6097 concerning any questions.

Very truly yours,

Grover Thomas,  
Environmental Manager  
**COLUMBUS COATED FABRICS**

GT/rap





August 28, 1991

Mr. Bill Wesley  
Work Assignment Manager  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

**Re: TES X WA No. R05047 - Permit Specific Inspection Checklists  
Columbus Coated Fabrics (OHD 004 294 351)  
Final Checklist, Addenda, and Attachments**

Dear Bill:

Enclosed for your review are two copies of the final permit-specific checklist for Columbus Coated Fabrics (OHD 004 294 351). Included as Addenda to the checklist are generator recordkeeping (A), land disposal restrictions (LDR) requirements (B), and Waste Minimization (C). These Addenda cover requirements that could not readily be addressed in the permit-specific checklist. The LDR checklist was tailored for Columbus Coated Fabrics by eliminating extraneous questions from the Region V 1990 version.

The draft checklist was given a final review by the Contractor Project Manager. Minor edits were made, and a Waste Minimization Addendum added.

If you have any questions or comments, please call us at (312) 553-1400.

Sincerely,

METCALF & EDDY

Ed Karecki  
Environmental Scientist

Susan Lorenz  
Senior Environmental Scientist

Enclosure

cc: Fred Norling  
Document Control



## Attachment I

The following is a list of criteria used to write the checklist:

### 1. Prioritization of source material:

- a. If a Permit Condition specified compliance with an Attachment and a CFR subsection, Attachment material was given a priority. However, if the Attachment did not fully address all referenced CFR requirements, the CFR was used to fill data gaps.
- b. If a Permit Condition specified only compliance with an Attachment, and did not reference the parallel CFR subsection, the CFR was not used to fill in any data gaps which may have existed.
- c. If an Attachment contained information relevant to a Permit Condition, but was not referenced, the Attachment information was used (per Rhett Nelson, ORC).
- d. If a question addresses a HSWA issue which was not covered in the permit, the question is based solely on the CFR.

### 2. Duplication of requirements:

If two Permit Conditions had overlapping requirements, these requirements were addressed only in one checklist section. A note to that effect generally was inserted in the checklist section which did not cover the duplicate requirement.

### 3. Explanation of Permit Condition cites:

- a. At least one Permit Condition is usually cited. A second Permit Condition cite reflects duplication of requirements. It generally falls at the end of the cite after a semi-colon. (See comment 2 above.)
- b. Attachments are cited if they were referenced in Permit Condition, or if they contained relevant information.
- c. The CFR is cited if it was referenced in a Permit Condition, and neither the Permit Condition nor relevant Attachment covered the requirement. It is also cited for HSWA requirements not covered in the permit.

### 4. Checklist Formatting:

- a. "If" questions either include an NA (not applicable) answer option, or are followed by "Go to" statements. "Go to" statements include a blank to check if the inspector is going to skip a portion of the checklist she/he has determined to be non-applicable.
- b. CD (cannot determine) answer options were used primarily in the Personnel Training and Contingency Plan sections. Personnel training records are frequently substandard; consequently the inspector cannot verify that appropriate training has been received. The Contingency Plan section asks questions regarding undocumented actions by the Emergency Coordinator in an emergency.
- c. Use was made of permit Attachment tables and diagrams to control the length of the actual checklist. These were renamed as lettered checklist attachments to avoid confusion with numbered permit Attachments. The source of each is given in the table of contents to the checklist.







July 10, 1991

Mr. Bill Wesley  
Work Assignment Manager  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

**Re: TES X WA No. R05047 - Permit Specific Inspection Checklists  
Columbus Coated Fabrics (OHD 004 294 351)  
Draft Checklist, Addenda, and Attachments**

Dear Bill:

Enclosed for your review are two copies of the draft permit-specific checklist for Columbus Coated Fabrics (OHD 004 294 351). Included as Addenda to the checklist are generator recordkeeping (A), and land disposal restrictions (LDR) requirements (B). These Addenda cover requirements that could not readily be addressed in the permit-specific checklist. The LDR checklist was tailored for Columbus Coated Fabrics by eliminating extraneous questions from the Region V 1990 version.

The following is a list of criteria used to write the checklist:

1. Prioritization of source material:

- a. If a Permit Condition specified compliance with an Attachment and a CFR subsection, Attachment material was given a priority. However, if the Attachment did not fully address all referenced CFR requirements, the CFR was used to fill data gaps.
- b. If a Permit Condition specified only compliance with an Attachment, and did not reference the parallel CFR subsection, the CFR was not used to fill in any data gaps which may have existed.
- c. If an Attachment contained information relevant to a Permit Condition, but was not referenced, the Attachment information was used (per Rhett Nelson, ORC).
- d. If a question addresses a HSWA issue which was not covered in the permit, the question is based solely on the CFR.

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- b. Attachments are cited if they were referenced in Permit Condition, or if they contained relevant information.



c. The CFR is cited if it was referenced in a Permit Condition, and neither the Permit Condition nor relevant Attachment covered the requirement. It is also cited for HSWA requirements not covered in the permit.

#### 4. Checklist Formatting:

a. "If" questions either include an NA (not applicable) answer option, or are followed by "Go to" statements. "Go to" statements include a blank to check if the inspector is going to skip a portion of the checklist she/he has determined to be non-applicable.

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c. Use was made of permit Attachment tables and diagrams to control the length of the actual checklist. These were renamed as lettered checklist attachments to avoid confusion with numbered permit Attachments. The source of each is given in the table of contents to the checklist.

If you have any questions or comments, please call either me at (312) 427-8752.

Sincerely,

METCALF & EDDY



Ed Karecki  
Environmental Scientist



Susan Lorenz  
Senior Environmental Scientist

Enclosure

cc: Fred Norling  
Permitting  
Document Control



COLUMBUS COATED FABRICS (OHD 004 294 351)  
PERMIT-SPECIFIC INSPECTION CHECKLIST

FACILITY LOCATION: 1280 North Grant Ave.  
Columbus, Ohio

MAILING ADDRESS: \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

FACILITY CONTACT: \_\_\_\_\_

PERMITTED ACTIVITIES: Container storage, not to exceed 24,750 gallons

PERMITTED WASTES: D006, F002, F003, F005, F006

SIC CODE: \_\_\_\_\_

	Name	Title	Affiliation	Phone
INSPECTORS:	_____	_____	_____	_____
	_____	_____	_____	_____
FACILITY PERSONNEL:	_____	_____	_____	_____
	_____	_____	_____	_____
INSPECTION DATE:	_____		INSPECTION TIME:	_____

## I. STANDARD CONDITIONS

### I.A. EFFECT OF PERMIT

Columbus Coated Fabrics (CCF) is only allowed to store hazardous waste in containers. Are any other methods of storage, treatment, or disposal employed at the facility? (I.A.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, note unpermitted activities: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### I.B. PERMIT ACTIONS

1. Has CCF requested permit modifications under 270.42 whenever necessary, including but not limited to, addressing HSWA regulations for the toxicity characteristic and the land disposal restrictions program? (I.B.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, note class and date of each modification: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Is there any cause for modification or revocation and reissuance of CCF's permit by EPA under 270.41? (I.B.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Is there any cause for termination of CCF's permit under 270.43? (I.B.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### I.C. SEVERABILITY

No questions required. (I.C.)

### I.D. DUTIES AND REQUIREMENTS

1. DUTY TO COMPLY

If CCF has conducted activities or managed wastes not covered by their permit, did they obtain an emergency permit? (I.D.1.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note circumstances (if applicable): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. DUTY TO REAPPLY

The expiration date of CCF's permit is June 29, 1997. If the facility has operated under an expired permit, did they submit a permit application at least 180 days before the expiration date? (I.D.2.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note date of new permit application (if applicable): \_\_\_\_\_

3. PERMIT EXPIRATION

No questions required. (I.D.3.)

4. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

No questions required. (I.D.4.)

5. DUTY TO MITIGATE

In the event of noncompliance with their permit, did CCF take reasonable steps to minimize or correct any adverse impact on the environment? (I.D.5.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Describe any noncompliance/mitigation events: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. PROPER OPERATION AND MAINTENANCE

No questions required. (I.D.6.)

7. DUTY TO PROVIDE INFORMATION

Has CCF furnished to the Regional Administrator, within a reasonable time after his request, information relevant to modifying, revoking, reissuing, terminating, or determining compliance with their permit, or copies of records required to be kept by their permit? (I.D.7.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

If No, note circumstances: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. INSPECTION AND ENTRY

If requested, has CCF allowed the Regional Administrator, or an authorized representative, upon presentation of credentials and other documents required by law to, at reasonable times:

a. Enter facility premises where regulated activities and permit-required records are located? (I.D.8.a.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

b. Have access to and copy any permit-required records? (I.D.8.b.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. Inspect facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under their permit? (I.D.8.c.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

d. Sample or monitor any substance(s) for any parameter(s) to ensure permit compliance (or as otherwise authorized by RCRA)? (I.D.8.d.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Describe any denial of access circumstances: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. MONITORING AND RECORDS

Note: Monitoring records retention is addressed in checklist section II.K.1. No further questions required.

a. Permit Condition I.D.9.a. is addressed in checklist section II.C. No further questions required. (I.D.9.a.)

b. Do monitoring records include the following:

i. Monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation? (I.D.9.b.)

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. Copies of reports and records required by their permit? (I.D.9.b.)

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Records of all data used to complete the Part B permit application? (I.D.9.b.)

Yes \_\_\_\_\_ No \_\_\_\_\_



c. Do records of monitoring information specify the following:

i. The dates, exact places, and times of sampling or measurement? (I.D.9.c.i.)

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. The individuals who performed the sampling or measurement? (I.D.9.c.ii.)

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. The dates analyses were performed? (I.D.9.c. iii.)

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. The individuals who performed the analyses? (I.D.9.c.iv.)

Yes \_\_\_\_\_ No \_\_\_\_\_

v. The analytical techniques or methods used? (I.D.9.c.v.)

Yes \_\_\_\_\_ No \_\_\_\_\_

vi. The results of such analyses? (I.D.9.c.vi.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any irregularities in monitoring records: \_\_\_\_\_

\_\_\_\_\_

#### 10. REPORTING PLANNED CHANGES

If there have been any physical alterations or additions to the permitted facility, did CCF notify the Regional Administrator as soon as possible during the planning stage and within 10 days of the decision to make the change? (I.D.10.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note any physical alterations or additions: \_\_\_\_\_

\_\_\_\_\_

#### 11. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

If CCF has not modified or constructed new storage areas, check here \_\_\_\_\_ and go to checklist section I.D.12.

Were the following conditions met prior to storage or treatment of hazardous wastes in modified or newly constructed areas:

a. A letter delivered to the Regional Administrator by certified mail or hand delivery which was signed by CCF and a registered

professional engineer, stating that the unit was constructed or modified in compliance with the permit? (I.D.11.a.)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. One of the following:

i. Did the Regional Administrator inspect the affected unit and find it to be in compliance with the permit? (I.D.11.b.i.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

OR

ii. Did the Regional Administrator either waive the inspection or not notify CCF within fifteen days of the intention to inspect? (I.D.11.b.ii)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section I.D.11. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 12. ANTICIPATED NONCOMPLIANCE

If CCF has planned any changes in the permitted facility or activities which potentially could (have) result(ed) in noncompliance with the permit, was advance notice given to the Regional Administrator? (I.D.12.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note any such planned changes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 13. TRANSFER OF PERMITS

If ownership or operation of the facility was transferred during its operating life, did CCF notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270? (I.D.13.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note date and nature of any change in ownership: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 14. COMPLIANCE SCHEDULE

Have all reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in

compliance schedules, been submitted within fourteen days of the schedule date? (I.D.14.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any outstanding reports: \_\_\_\_\_

15. TWENTY-FOUR HOUR REPORTING

If permit noncompliance has not resulted in health or environmental endangerment, check here \_\_\_\_\_ and go to checklist section I.D.16.

When noncompliance with their permit has resulted in endangerment of health or the environment, has CCF orally reported the following to the Regional Administrator within twenty-four hours:

a. Information on releases which may have endangered public drinking water supplies? (I.D.15.a.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

b. Information on releases, discharges, fires, or explosions which could threaten human health or the environment outside the facility? (I.D.15.b.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. Was a written report submitted within five days of noncompliance, or fifteen days if allowed by the Regional Administrator? (I.D.15.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If No, check here \_\_\_\_\_ and go to checklist section I.D.16.

d. Did each written report contain the following:

i. A description of the noncompliance and its cause? (I.D.15.)

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. The period of noncompliance, including exact dates and times? (I.D.15.)

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Whether the noncompliance had been corrected, or the anticipated time the noncompliance would continue? (I.D.15.)

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. Steps planned or taken to reduce, eliminate, and prevent recurrence? (I.D.15.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any reporting concerns: \_\_\_\_\_  
\_\_\_\_\_

16. OTHER NONCOMPLIANCE

If there have been other instances of noncompliance not reported in I.D.15 above, have these been reported at the time monitoring reports were submitted? (I.D.16.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Describe any noncompliance events not reported: \_\_\_\_\_  
\_\_\_\_\_

17. OTHER INFORMATION

If CCF became aware that relevant information was not submitted in their permit application, or that incorrect information was submitted in either their permit application or reports, was such information forwarded to the Regional Administrator? (I.D.17.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note any data gaps not reported: \_\_\_\_\_  
\_\_\_\_\_

18. SUBMITTAL OF WRITTEN REPORT

Were all permit required reports submitted to U.S. EPA, Region V, Waste Management Division, Attn: Technical, Permits and Compliance Section, 230 South Dearborn Street, Chicago, Illinois 60604. (I.D.18)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any alternate addresses used: \_\_\_\_\_  
\_\_\_\_\_

I.E. SIGNATORY REQUIREMENT

Have all reports or other information requested by the Regional Administrator been signed and certified in accordance with 40 CFR 270.11? (I.E.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any deficiencies: \_\_\_\_\_  
\_\_\_\_\_

I.F. CONFIDENTIAL INFORMATION

Has CCF claimed as confidential any information required to be submitted by this permit as per 40 CFR 270.12? (I.F.)

Yes                      No

Note any affected activities: \_\_\_\_\_

## I.G. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

Does CCF maintain at the facility the following documents, including any amendments, revisions, and modifications (documents to be retained until closure certification):

- |                                                                                                                    |     |     |    |     |
|--------------------------------------------------------------------------------------------------------------------|-----|-----|----|-----|
| 1. Waste analysis plan (I.G.1.)                                                                                    | Yes | ___ | No | ___ |
| 2. Inspection schedule (I.G.2.)                                                                                    | Yes | ___ | No | ___ |
| 3. Contingency plan (I.G.3., II.I.2.)                                                                              | Yes | ___ | No | ___ |
| 4. Closure plan (I.G.4.)                                                                                           | Yes | ___ | No | ___ |
| 5. Most current closure cost estimate<br>(I.G.5., II.K.1., II.M.3.)                                                | Yes | ___ | No | ___ |
| 6. Operating record (See II.K.1. of<br>checklist for required elements) (I.G.6.)                                   | Yes | ___ | No | ___ |
| 7. Personnel training documents and records<br>(See II.F.5. of checklist for required elements)<br>(I.G.7., II.F.) | Yes | ___ | No | ___ |

Note: Permit Condition I.G.7 is a repeat of I.G.2.; it should address training instead.

ADDITIONAL SECTION I. COMMENTS: \_\_\_\_\_

## II. GENERAL FACILITY CONDITIONS

### II.A. DESIGN AND OPERATION OF FACILITY

Note: Emphasis in the following question is on overall facility activities. It may be assessed most effectively after the inspection is complete.

Does CCF maintain and operate the facility so as to minimize the possibility of fire, explosion, and any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, ground water or surface water, which could threaten human health or the environment? (II.A.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any areas of concern: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### II.B. REQUIRED NOTICE

1. If CCF expects to, or has received hazardous waste from a foreign source, has the Regional Administrator been notified at least four weeks in advance? (II.B.1.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note: Subsequent shipments of the same waste, from the same source, within the same calendar year do not require additional notification.

2. If CCF received waste from an outside source, did they inform the generator in writing that they had all appropriate permits and could accept the waste? (II.B.2.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

3. If Yes, are copies of such notices maintained in the operating record? (II.B.2.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note: This question is not posed in section II.K.1. because Permit Condition II.K.1. does not require compliance with 264.73(b)(7).

Describe any notification deficiencies: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### II.C. GENERAL WASTE ANALYSIS

Note: The waste analysis plan contains no criteria for incoming hazardous waste shipments.

1. Waste Analysis

a. Are all wastes to be shipped off-site inspected by a chemist and the hazardous waste coordinator, and divided into two groups: definitely non-hazardous, and possibly hazardous? (II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. For wastes which are possibly hazardous, is a representative sample of each wastestream analyzed by Stilson Laboratories in Columbus? (II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Are the wastes analyzed for the following:

Toxicity Characteristic  
(II.C., 261.24)

Yes \_\_\_\_\_ No \_\_\_\_\_

Corrosivity  
(II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

Ignitability?  
(II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

Reactivity?  
(II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note: Page 39 of permit Attachment II specifies EP toxicity. However, HSWA regulations have replaced this characteristic with the toxicity characteristic, which is determined using the toxicity leaching procedure.

d. Are new and/or changed waste streams analyzed to determine the appropriate disposal method? (II.C., page 39 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

e. Are wastes tested using the method described in Attachment A-2 to determine whether they are solid or liquid? (II.C., page 38 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

f. Does CCF have a program in place to address analytical requirements for the Land Disposal Restrictions Program? (264.13(a)(1&2), 268.7(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

Note: Further detail regarding Land Disposal Restrictions analyses are in Addendum B of this checklist.

Section II.C.1. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Sampling Methods

a. Are samples collected using the equipment listed in Attachment A-1? (II.C., pages 37 and 38c of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Are samples collected using the methods described in Attachment A-3? (II.C., pages 37, 38, 38e, 38g, and 38i of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.C.2. Comments: \_\_\_\_\_

3. Sample Log

Is a sample log maintained which states the type of sample taken, method used to obtain, and date sent to Stilson Laboratory for analyses? (II.C., page 38 of Attachment II)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.C.3 Comments: \_\_\_\_\_

II.D. SECURITY

1. Does CCF have a twenty-four hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? (II.D., 264.14(b)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

2. If No, does the facility have the following:

a. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? (II.D., 264.14(b)(2)(i))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

b. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? (II.D., 264.14(b)(2)(ii))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

3. Are there signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations, in sufficient numbers to be seen from any approach to the active portion of the facility? (II.D., 264.14(c))

Yes \_\_\_\_\_ No \_\_\_\_\_



Section II.D. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## II.E. GENERAL INSPECTION REQUIREMENTS

### 1. Inspections

a. Are inspections conducted according to the schedule shown in Attachment A-4? (II.E., page 47 of Attachment III)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. If inspections reveal that non-emergency maintenance is needed, is it completed as soon as possible to avoid further damage and reduce the need for emergency repairs? (II.E., page 46 of Attachment III)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. If inspections reveal that a hazard is imminent or has already occurred is remedial action taken immediately? (II.E., page 46 of Attachment III)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note any inspection concerns: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 2. Inspection Records

Note: Retention of inspection records is addressed in checklist section II.K.1.

a. Do inspection records contain the following? (II.E., 264.15(d))

Date and time of inspection	Yes _____	No _____
Signature of the inspector	Yes _____	No _____
Notation of observations made	Yes _____	No _____
Date and nature of any repairs or other remedial actions	Yes _____	No _____

b. Does the inspector indicate the actual daily inventory of the number and type of hazardous waste drums in storage on a hazardous waste drum inventory sheet? (II.E., page 45 of Attachment III)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any inspection record concerns: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## II.F. PERSONNEL TRAINING

1. Is the training program directed by personnel qualified in hazardous waste management procedures? (II.F., 264.16(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

The permit specifies Norman Orr as Safety Director. Note any changes: \_\_\_\_\_

2. Do all new personnel complete the training program within 6 months of assignment to the hazardous waste storage facility or within six months of their date of hire, whichever is later? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

3. Do all hazardous waste management employees receive a review and update of the training program twice per year? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

4. Are the following subjects discussed during initial and twice a year training:

a. All hazardous wastes handled, including: waste type, volume, source, characteristics, and location? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

b. The status of storage and operating conditions and procedures, noting areas where there are problems or potential problems? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

c. The requirements of the facility's RCRA permit, including any changes? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

d. Incidents that have occurred in the past year that warranted use of the contingency plan and/or emergency action? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

e. Fire/emergency procedures and location of fire alarms and escape routes? (II.F., page 100aa. of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

f. Do employees who work in the Solvent Still area and who

handle still bottoms receive additional training for these activities? (II.F., page 100aa. of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

g. Do new employees only work with supervision before completing initial training? (II.F., page 100g of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Note any training concerns: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 5. Training Records

Note: Personnel training records retention is addressed in checklist section I.G.7. Requirements of 264.16(d)(3) are fulfilled in Permit Attachment IV.

a. Are current job titles and names of employees filling these jobs documented? (II.F., pages 100g and 100h of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Are current job descriptions documented? (II.F., pages 100g and 100h of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Do facility records document both initial training and twice a year refresher training for current employees? (II.F., pages 110g and 100h of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_

d. Do facility records document both initial and annual refresher training for employees terminated within the last three years? (II.F., page 100h of Attachment IV)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any training record concerns: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## II.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

1. Are ignitable and reactive wastes appropriately separated and protected from sources of ignition or reaction? (II.G., 264.17(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

2. When ignitable or reactive wastes are being handled, are smoking and open flames confined to designated areas? (II.G., 264.17(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Are "No Smoking" signs conspicuously placed wherever there is a hazard from ignitable or reactive wastes? (II.G., 264.17(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.G. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## II.H. PREPAREDNESS AND PREVENTION

### 1. REQUIRED EQUIPMENT

Is the equipment listed in checklist Attachment B-1 located at the facility in the specified areas? (II.H.1., page 71b of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 2. TESTING AND MAINTENANCE OF EQUIPMENT

This Permit Condition is addressed under checklist Section II.E. No further questions required. (II.H.2.)

### 3. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM

a. Do all personnel have access to an internal alarm or emergency communication device whenever hazardous waste is being handled? (II.H.3., 264.34(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Does the facility ensure that no one works alone without immediate access to a communication device capable of summoning external emergency service? (II.H.3., 264.34(b))

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.H.3. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 4. REQUIRED AISLE SPACE

Does the facility maintain aisle space to allow for unobstructed movement of personnel and fire protection, spill control, and decontamination equipment? (II.H.4., 264.35)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments : \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. ARRANGEMENTS WITH LOCAL AUTHORITIES

a. Has CCF attempted to make the following arrangements:

i. Arrangements to familiarize police, fire departments, and emergency response teams with the facility layout, hazardous waste properties (and associated hazards), typical work locations, entrances/roads inside the facility, and potential evacuation routes? (II.H.5., 264.37(a)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. Agreements regarding primary and support emergency authority where more than one police or fire department might respond to an emergency? (II.H.5., 264.37(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (II.H.5., 264.37(a)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. Arrangements to familiarize local hospitals with hazardous waste properties and associated injuries or illness? (II.H.5., 264.37(a)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_

b. If State or local agencies have declined to enter such arrangements, has CCF documented the refusal in the operating record? (II.H.5., 264.37(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.H.5. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

II.I. CONTINGENCY PLAN

1. IMPLEMENTATION OF THE PLAN

a. If a fire, explosion, or release of hazardous waste or constituents which threatened or could threaten human health or the environment occurred, was the contingency plan implemented? (II.I.1.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

If an emergency event has not occurred, check here \_\_\_\_\_ and go to checklist section II.I.2.

b. Emergency Response Procedures

i. Did the operating personnel notify their foreman and take immediate steps to contain the problem? (II.I.1., page 59 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ii. Did one of the foremen notify the Emergency Coordinator, or one of the alternate Emergency Coordinators if he was absent? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

iii. Did all hazardous waste and solvent still activity cease? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

iv. Were the hazardous waste and solvent still areas monitored by the solvent still operator for leaks, pressure build-ups, gas generation, or ruptures? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

v. Did the Emergency Coordinator make a decision on evacuation of facility personnel? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

vi. If emergency assistance was required, were appropriate Federal, State, or local agencies contacted? (II.I.1., 264.56(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

vii. Was the nature, specific source, quantity, and aerial extent of released material immediately assessed? (II.I.1., 264.56(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

viii. Were potential hazards to human health and the environment assessed? (II.I.1., 264.56(c))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ix. If the emergency Coordinator determined that an immediate threat to human health or the environment was posed, did she/he do the following:

(a) Notify appropriate local authorities of any need to evacuate local areas? (II.I.1. 264.56(d)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

Note: Page 60 of permit Attachment V, states that there are no residents in proximity to the facility, however this question assumes a worst case scenario.

(b) Notify the on-scene coordinator (government official) responsible for the geographical area, or the National Response Center? (II.I.1., 264.56(d)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

Section II.I.1.b. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. Control Procedures - General

Note: The following information is taken from an permit Attachment V section headed 'Fire and Explosion Emergency Action Plan'. However, the plan addresses 'other incidents of major proportions' as well as fires and explosion.

i. Did the operating shift superintendent in the area of the take charge and direct the Emergency Brigade in emergency activities? (II.I.1., page 68 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ii. Did the Operating Foreman perform the activities listed in Attachment B-5? (II.I.1., page 68 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

iii. Did the Emergency Brigade perform the activities listed in Attachment B-6? (II.I.1., pages 68 and 69 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

iv. Did the Shift Maintenance Foreman perform the activities listed in Attachment B-7? (II.I.1., page 69 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

v. Did the Security Guards perform the activities listed in Attachment B-8? (II.I.1., page 69 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

vi. During day hour assignments or upon arrival did the personnel listed in Attachment B-9 perform the activities listed? (II.I.1., pages 69 and 70 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

vii. Did the Emergency Coordinator have on-site analytical services available? (II.I.1., page 71 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.c. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. Control Procedures - Spills

If a spill has not occurred at the facility, check here \_\_\_\_\_ and go to checklist section II.I.1.e.

i. If a spill occurred outside of the storage building, was sand used to contain the spill? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

ii. If a spill entered the storm sewer system, was the City of Columbus notified and the outfall monitored? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

iii. Was all spilled liquid pumped into drums? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

iv. Were all spilled solids shoveled into drums? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

v. Were all drums that contained recovered spill material sent to the appropriate licensed hazardous waste landfill? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

vi. Were wash waters from decontamination collected, drummed, and disposed of at a licensed disposal facility? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.d. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

e. Control Procedures - Fire/Explosion

If a fire or explosion has not occurred, check here \_\_\_\_\_ and go to section I.1.f.



i. Was the fire alarm activated? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ii. Did the fire alarm alert the CCF Emergency Brigade and the City of Columbus Fire Department? (II.I.1., page 60 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

iii. Were the activities listed in Attachment B-11 performed? (II.I.1., page 71 of Attachment V)

Yes \_\_\_\_\_ No. \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.e. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

f. Storage and Treatment of Released Material

i. After the emergency was over, did the Emergency Coordinator immediately make arrangements for proper treatment, storage, or disposal of recovered wastes and contaminated soil, water, or other material? (II.I.1., 264.56(g))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ii. Was care taken to not treat or store any materials which were incompatible with releases until cleanup was complete? (II.I.1., 264.56(h))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.f. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

g. Post-Emergency Equipment Maintenance

Prior to resumption of operations, were the following performed:

i. All contaminated equipment used during emergency cleanup steam cleaned, rinsed and placed in the storage area? (II.I.1., page 61 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

ii. The Regional Administrator and State and local authorities notified that post-emergency equipment maintenance was completed? (II.I.1., 264.56 (i))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.g. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

h. Reporting

Were all emergencies requiring contingency plan implementation reported to OEPA and the Regional Administrator within fifteen days? (II.I.1., 264.56 (j))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

Section II.I.1.h. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. COPIES OF PLAN

Note: Retention of contingency plan copy at the facility is addressed in checklist section I.G.3.

Were copies of the contingency plan submitted to all local police, fire departments, and hospitals that may be called upon to provide emergency services? (II.I.2., page 83b of attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

3. AMENDMENTS TO PLAN

Was the contingency plan reviewed and immediately amended if any of the following occurred:

a. Permit revised? (II.I.3., 264.54(a))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

b. The contingency plan failed in an emergency? (II.I.3., 264.54(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. The facility changed such that the potential for fires, explosions, or releases required changes in emergency response procedures? (II.I.3., 264.54(c))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

d. Emergency Coordinator list, changed? (II.I.3., 264.54(d))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

e. The list of emergency equipment changed? (II.I.3., 264.54(e))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.I.3. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. EMERGENCY COORDINATOR

a. Is one of the Emergency Coordinators either on the premises or on call at all times? (II.I.4., 264.55)

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

b. Are the Emergency Coordinators familiar with the following: (II.I.4., 264.55)

Contingency Plan	Yes _____	No _____	CD _____
Facility operations/ activities	Yes _____	No _____	CD _____
Waste characteristics and locations	Yes _____	No _____	CD _____
Location of facility records	Yes _____	No _____	CD _____
Facility layout	Yes _____	No _____	CD _____

c. Do the Emergency Coordinators have the authority to commit resources needed to carry out the contingency plan? (II.I.4., 264.55)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.I.4. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

II.J. MANIFEST SYSTEM

1. Incoming Manifested Shipments

If CCF does not accept waste from off-site, check here \_\_\_\_\_ and go to section II.J.5.

Does CCF perform the following for each incoming hazardous waste shipment accompanied by a manifest?

a. Sign and date each copy of the manifest to certify receipt. (II.J., 264.71(a)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Note any significant discrepancies on each copy of the manifest. (II.J., 264.71(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. Provide transporter with a copy of the signed manifest. (II.J., 264.71(a)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

d. Send a copy of the manifest to the generator within thirty days after delivery. (II.J., 264.71(a)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

e. Retain a copy of the manifest at the facility for at least three years from the date of delivery. (II.J., 264.71(a)(5))

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.J.1. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Incoming Rail or Water Bulk Shipments

If bulk shipments are not received by rail or water, check here \_\_\_\_\_ and go to checklist section II.J.3.

Did CCF perform the following for each incoming rail or water (bulk) shipment accompanied by a shipping paper?

a. Sign and date each copy of the shipping paper (or manifest if received) to certify receipt. (II.J., 264.71(b)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Note any significant discrepancies on each copy of the shipping paper (or manifest if received). (II.J., 264.71(b)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. Provide transporter with a copy of the signed shipping paper (or manifest if received). (II.J., 264.71(b)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

d. Send a copy of the shipping paper (or manifest if received) to the generator within thirty days after delivery. (II.J., 264.71(b)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

e. Retain a copy of the manifest, or the shipping paper if signed in lieu of the manifest at the time of delivery, for at least three years from the date of delivery. (II.J., 264.71(b)(5))

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.J.2. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. If manifest discrepancies were not resolved within fifteen days after receiving a waste shipment, was a letter describing the discrepancy and reconciliation attempts, and a copy of the

manifest or shipping paper at issue, sent to the Regional Administrator? (II.J., 264.72(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Comments: \_\_\_\_\_

4. If hazardous wastes were accepted without a manifest or shipping paper, and the shipment was not excluded under 261.5 (conditionally exempt small quantity generator), was EPA form 8700-13B (Unmanifested Waste Report) submitted to the Regional Administrator within fifteen days of receiving the waste? (II.J., 264.76)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Comments: \_\_\_\_\_

5. Hazardous Waste Shipments Initiated at the Facility

- a. Does CCF prepare a manifest for each hazardous waste shipment prior to movement off site? (II.J., 264.71(c), 262.20(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

- b. Does CCF comply with the following for each manifest:

i. Designate one facility which is permitted to manage the waste, and an alternate facility to which the waste may be shipped in the event of an emergency? (II.J., 264.71(c), 262.20(b&c))

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. Sign the manifest certification by hand? (II.J., 264.71(c), 262.23(a)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? (II.J., 264.71(c), 262.23(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. Keep one copy of the manifest? (II.J., 264.71(c), 262.23(a)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_

v. Give remaining copies to the transporter? (II.J., 264.71(c), 262.23(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_

vi. Replace the retained copy with the receiving facility's signed copy upon receipt, and keep on file for three years? (II.J., 264.71(c), 262.40(a))

Yes \_\_\_\_\_ No \_\_\_\_\_

vii. For bulk water shipments, send three copies (dated and signed) to either the designated stateside facility, or to the last transporter to handle the waste in the United States? (II.J., 264.71(c), 262.23(c))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

viii. For rail shipments, send three copies (dated and signed) to either the designated stateside facility if transported solely by rail, the next non-rail transporter, or the last rail transporter to handle the waste in the United States? (II.J., 264.71(c), 262.23(d))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

ix. For shipments to States which are not authorized to regulate the particular waste as hazardous, ensure that the facility agrees to sign and return the manifest? (II.J., 264.71(c), 262.23(e))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

c. If CCF is a large quantity generator, and does not receive a signed copy of a manifest from the receiving facility within thirty-five days, do they:

i. Attempt to determine the status of the shipment by contacting the transporter or receiving facility? (II.J., 264.71(c), 262.42(a)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_ CD \_\_\_\_\_ NA \_\_\_\_\_

ii. Send an Exception Report to the Regional Administrator if an additional ten days passes without receiving a signed manifest? (II.J., 264.71(c), 262.42(a)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

d. If CCF is a small quantity generator, and does not receive a signed copy of a manifest from the receiving facility within sixty days, is a copy of the unsigned manifest, and some indication that confirmation of delivery was not received, sent to the Regional Administrator? (II.J., 264.71(c), 262.42(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.J.5. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## II.K. RECORDKEEPING AND REPORTING

Note: Generator recordkeeping is addressed in checklist Addendum A.

### 1. OPERATING RECORD

Note: Requirement for an operating record is addressed in checklist section I.G.6.

Is the following information recorded (as it becomes available) in the operating record (all records to be retained until closure unless otherwise noted):

a. A description and the quantity of each hazardous waste, and the method(s) and date(s) of its treatment or storage? (II.K.1., 264.73(b)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

b. The location of each hazardous waste and the quantity at each location, including cross references to manifest numbers? (II.K.1., 264.73(b)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

c. Records and results of waste analyses? (II.K.1., 264.73(b)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

d. Summary reports and details of all incidents that required contingency plan implementation? (II.K.1., 264.73(b)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

e. Records and results of inspections (retain for three years only)? (II.K.1., 264.73(b)(5); II.E)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

f. Monitoring, testing, and analytical data? (See checklist Section I.D.9. for required records.) (II.K.1., 264.73(b)(6))

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

g. Most current closure cost estimate? (II.K.1., 264.73(b)(8); II.M.3, II.K.1.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

## 2. BIENNIAL REPORT

Has CCF submitted a Biennial Report on EPA form 8700-13B for wastes received from off site to the Regional Administrator by March 1 of each even numbered year? (II.K.2., 264.75)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

## II.L. CLOSURE

### 1. PERFORMANCE STANDARD

If CCF has not undergone Final Closure (of the facility) or Partial Closure (closure of the container storage area), check here \_\_\_\_\_ and go to checklist section II.L.2.

Note: Page 101 of permit Attachment VI states that Partial Closure does not apply to this facility. However, Partial Closure is currently under consideration.

#### a. Partial Closure

i. Have all drums of solid waste been transported for land disposal, and all drums of liquid waste transported to a treatment facility? (II.L.1., page 103 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. Have all empty drums which contain residual hazardous waste been rinsed with an appropriate solvent, and the wash waste recovered in the solvent still? (II.L.1., page 103 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Have all leaking drums been enclosed in an overpack



drum and transported to the appropriate facility? (II.L.1., page 103 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. Have the drum storage area, and surrounding drum handling areas been decontaminated by steam cleaning, of any residual waste material? (II.L.1., page 104 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

v. Were the wash waters from this decontamination collected and transported to a treatment facility? (II.L.1., page 104 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

vi. Were wastes transported by, and disposed of at, the facilities listed in Attachment B-2? (II.L.1., page 105 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

vii. Have soils been tested in storage and handling areas, and any contaminated soils removed to an approved disposal facility? (II.L.1., page 102 of Attachment VI, 264.111, II.L.5., 264.114)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.L.1.a. Comments : \_\_\_\_\_

#### b. Final Closure

If final closure has not occurred check here \_\_\_\_\_ and go to section II.L.2.

i. Have all recyclable solvents been treated? (II.L.1., page 103 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

ii. Has all piping used in connection with the solvent still been disconnected, dismantled, and decontaminated, and wash water contained and properly disposed of? (II.L.1., pages 103 and 104 of Attachment VI, 264.111)

Yes \_\_\_\_\_ No \_\_\_\_\_

iii. Have the still bottoms collection tank and drumming pit been steam cleaned, the contaminated wash waters contained, and transported for treatment? (II.L.1., page 104 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

iv. Have fork lifts, shovels and squeegees used to move drums or handle wastes been steam cleaned? (II.L.1., page 104 of Attachment VI; II.L.5., 264.114)

Yes \_\_\_\_\_ No \_\_\_\_\_

v. Has all equipment that is contaminated beyond the potential for cleaning, been drummed and disposed of at a licensed disposal facility? (II.L.1., pages 1-4 of Attachment VI; II.L.5., 264.114)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

vi. Have the Banbury mixers and the electroplating sump been decontaminated, and contaminated soil removed and properly disposed of? (II.L.1., page 102 of Attachment VI, 264.111, 264.228(a)(1); II.L.5., 264.114)

Yes \_\_\_\_\_ No \_\_\_\_\_

vii. Have all other hazardous waste handling and loading equipment and areas been decontaminated, and contaminated equipment, soils and washwaters properly disposed of? (II.L.1., page 102 of Attachment VI, 264.111; II.L.5., 264.114)

Yes \_\_\_\_\_ No \_\_\_\_\_

viii. Were wastes transported by, and disposed of at, the facilities listed in Attachment B-2? (II.L.1., page 105 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.L.1.b. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 2. AMENDMENT TO CLOSURE PLAN

a. Have any of the following affected the closure plan: changes in operating plans, facility design, or expected year of closure; unexpected events in the course of closure activities?

Yes \_\_\_\_\_ No \_\_\_\_\_

b. If Yes, was a written request for a permit modification (including a copy of the amended plan) submitted to the Regional Administrator according to the time frame in 40 CFR 264.112(c)(3)? (II.L.2., 264.112(c))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note date of request (if applicable): \_\_\_\_\_

Note: Amendment to Closure is now 264.112(c), not 264.112(b) as listed in the permit.

Section II.L.2. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. NOTIFICATION OF CLOSURE

If either partial or final closure have occurred, or are now occurring, was the Regional Administrator notified 180 days prior to initiating closure activities? (II.L.3.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note date of notification (if applicable): \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. TIME ALLOWED FOR CLOSURE

If CCF has not received the final volume of hazardous waste in a unit or at the facility, check here \_\_\_\_\_ and go to checklist section II.M.

a. Within 90 days of receiving the last volume of waste in a unit (partial closure) or at the facility (final closure), were all wastes treated and removed according to closure plan criteria? (II.L.4., page 106 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note date of closure initiation: \_\_\_\_\_

b. Were closure activities performed according to the schedule in checklist Attachment B-3? (II.L.4., pages 106 and 107 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Were partial and/or final closure activities completed within 180 days of receiving the final shipment of waste? (II.L.4., page 106 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note date of closure completion: \_\_\_\_\_

Section II.L.4. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. DISPOSAL OR DECONTAMINATION OF EQUIPMENT

Permit Condition II.L.5. is addressed in checklist section II.L.1. No further questions required (II.L.5.)

6. CERTIFICATION OF CLOSURE

a. Was a certification of closure submitted to the Regional Administrator within 60 days of completion? (II.L.6., 264.115)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note date of certification (if applicable): \_\_\_\_\_

b. Was the certification of closure signed by the owner/operator and an independent, registered professional engineer? (II.L.6., page 101 of Attachment VI)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

c. If the Regional Administrator requested supporting documentation (prior to release from financial assurance), was it provided? (II.L.6., 264.115)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.L.6. Comments: \_\_\_\_\_

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II.M. COST ESTIMATE FOR FACILITY CLOSURE

Note: Closure cost estimate in checklist Attachment VI is \$57,547.

1. Has CCF adjusted the closure cost estimate for inflation annually, within thirty days of the anniversary date of the original estimate? (II.M.1.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note most current closure cost and date prepared: \_\_\_\_\_

2. If CCF has changed their closure plan, did they revise the closure cost estimate within thirty days of approval of the modified plan? (II.M.2., 264.142(c))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

3. Retention of most current closure cost estimate is addressed under checklist section I.G.5. No further questions required. (II.M.3.)

Section II.M. Comments: \_\_\_\_\_

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II.N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

1. Has the Regional Administrator notified CCF that they are no longer subject to financial assurance requirements due to final closure completion/certification? (II.N., 264.143)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, check here \_\_\_\_ and go to checklist section II.O.

2. Has CCF established financial assurance at least in the amount of their most recent closure cost estimate, using one of the options presented in 40 CFR 264.143(a-f)? (II.N., 264.143)

Yes \_\_\_\_ No \_\_\_\_

3. If financial assurance mechanisms have been changed, were they approved by the Regional Administrator per 40 CFR 264.143? (II.N)

Yes \_\_\_\_ No \_\_\_\_ NA \_\_\_\_

Note any changes: \_\_\_\_\_

4. Has the facility documented compliance with financial assurance requirements in adherence with 40 CFR 264.151? (II.N.)

Yes \_\_\_\_ No \_\_\_\_

Section II.N. Comments: \_\_\_\_\_

## II.O. LIABILITY REQUIREMENTS

1. Has the Regional Administrator notified CCF that they are no longer subject to liability insurance requirements due to final closure completion/certification? (II.O., 264.147(e))

Yes \_\_\_\_ No \_\_\_\_

If Yes, check here \_\_\_\_ and go to checklist section II.P.

2. Has CCF maintained liability coverage for sudden and accidental occurrences in the amount of one million dollars per occurrence, with an annual aggregate of two million dollars (exclusive of legal defense costs)? (II.O.)

Yes \_\_\_\_ No \_\_\_\_

Note any changes in coverage: \_\_\_\_\_

3. Has a signed duplicate original of either a Hazardous Waste Facility Liability Endorsement or Certificate of Liability Insurance (indicating that a current policy is in effect) been sent to the Regional Administrator? (II.O., 264.147(a)(1)(i))

Yes \_\_\_\_ No \_\_\_\_ NA \_\_\_\_

4. If a claim for bodily injury or property damage has been filed,

was the Regional Administrator notified in writing within thirty days? (II.O., 264.147(a)(7))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Note date and describe nature of claim (if applicable): \_\_\_\_\_

5. If CCF has reduced their amount of liability coverage, was the Regional Administrator notified in writing within thirty days? (II.O., 264.147(a)(7))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Comments: \_\_\_\_\_

6. Has the facility documented compliance with financial assurance requirements in adherence with 40 CFR 264.151? (II.O.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.O. Comments: \_\_\_\_\_

## II.P. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

1. If CCF has commenced proceedings under Title 11, was the Regional Administrator notified within ten days after proceedings commenced? (II.P., 264.148(a))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

2. If the institution providing financial assurance or insurance to CCF has filed bankruptcy, or has been suspended/revoked of authority to provide such assurance/insurance, did CCF establish alternative financial assurance or liability coverage within sixty days? (II.P., 264.148(b))

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.P. Comments: \_\_\_\_\_

## II.Q. FINANCIAL ASSURANCE AND DOCUMENTATION REQUIREMENTS

1. Did CCF use a state-required mechanism (pursuant to 264.149) to meet financial assurance for closure (264.143) and liability insurance (264.147) requirements? (II.Q.)

Yes \_\_\_\_\_ No \_\_\_\_\_



### III. STORAGE IN CONTAINERS

#### III.A. WASTE IDENTIFICATION

1. Does CCF store any containerized hazardous waste in permitted areas other than those listed in checklist Attachment B-4? (III.A.)

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, list: \_\_\_\_\_  
\_\_\_\_\_

2. Is the total volume of wastes stored limited to no more than 24,750 gallons? (III.A.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section III.A. Comments: \_\_\_\_\_  
\_\_\_\_\_

#### III.B. CONDITION OF CONTAINERS

If a container is not in good condition, (e.g., severe rusting, structural defects, leaking) are the contents transferred into a container in good condition or otherwise managed in compliance with their permit conditions? (III.B.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Describe typical procedures used for deteriorated containers: \_\_\_\_\_  
\_\_\_\_\_

#### III.C. COMPATIBILITY OF WASTE WITH CONTAINERS

Does CCF only use containers which will not react with, and are otherwise compatible with the wastes stored in them? (III.C., 264.172)

Yes \_\_\_\_\_ No \_\_\_\_\_

Note types of containers used for categories of wastes: \_\_\_\_\_  
\_\_\_\_\_

#### III.D. MANAGEMENT OF CONTAINERS

1. Are containers always stored closed, except when adding or removing wastes? (III.D., 264.173(a))

Yes \_\_\_\_\_ No \_\_\_\_\_



2. Are containers opened, handled, or stored in a manner which will not cause them to rupture or leak? (III.D., 264.173(b))

Yes \_\_\_\_\_ No \_\_\_\_\_

Note any unsafe handling practices: \_\_\_\_\_

### III.E. CONTAINMENT

1. Are all containers stored on a base which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and precipitation, until the material is detected and removed? (III.E., 264.175(b)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Is the base sloped or the containment system otherwise designed and operated to drain and remove liquids or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids? (III.E., 264.175(b)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Does the containment system have sufficient capacity to contain 10% of the volume of the containers (2475 gallons) or the volume of the largest container, whichever is greater (liquid holding containers only)? (III.E., 264.175(b)(3), III.A.)

Yes \_\_\_\_\_ No \_\_\_\_\_

4. Is the containment system designed to prevent run-on, unless it has sufficient excess capacity to contain it? (III.E., 264.175(b)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_

5. Is spilled or leaked material, and accumulated precipitation removed from the sump or collection area in as timely manner as is necessary to prevent overflow of this collection system? (III.E., 264.175(b)(5))

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Does the hazardous waste storage area meet the requirements listed in Attachment B-10? (III.E., pages 70 and 71 of Attachment V)

Yes \_\_\_\_\_ No \_\_\_\_\_

Section III.E. Comments: \_\_\_\_\_

### III.F. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

Are containers holding ignitable or reactive wastes located at least 50 feet from the facility's property line? (III.F.)

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_

### III.G. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. Prior to placing incompatible wastes in the same container, or into a container which previously held incompatible waste or material, were precautions taken to prevent the following:

a. Generation of extreme heat or pressure, fires or explosions, or violent reactions? (III.G.1., 264.17(b)(1))

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? (III.G.1., 264.17(b)(2))

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? (III.G.1., 264.17(b)(3))

Yes \_\_\_\_\_ No \_\_\_\_\_

d. Damage to the structural integrity of the container or facility? (III.G.1., 264.17(b)(4))

Yes \_\_\_\_\_ No \_\_\_\_\_

e. A threat to human health or the environment through any other means? (III.G.1., 264.17(b)(5))

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Prior to placing wastes in containers which previously held incompatible wastes or material, are the containers washed? (III.G.2.)

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Are dikes, berms, walls, or other devices used to separate containers of hazardous waste from incompatible wastes or materials? (III.G.3., 264.177(c))

Yes \_\_\_\_\_ No \_\_\_\_\_

4. Does the operating record contain documentation that the conditions of checklist sections III.G.1. and III.G.2. have been complied with? (III.G.4., 264.17(c))

Yes \_\_\_\_\_ No \_\_\_\_\_

Section III.G. Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

ADDITIONAL SECTION III. COMMENTS: \_\_\_\_\_

[illegible]



ADDENDA A-B

COLUMBUS COATED FABRICS  
(OHD 004 294 351)

Does CCF keep copies of the following generator documents for three years unless otherwise noted, or longer if required by unresolved enforcement action or requested by the Regional Administrator:

- Additional Comments:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins or other markings on the paper.

**ADDENDUM B**  
**RCRA LAND DISPOSAL RESTRICTIONS**  
**COLUMBUS COATED FABRICS (0HD 004 294 351**  
**40 CFR PART 268**

**I. WASTE IDENTIFICATION**

**A. Waste Code Determination**

Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic which is not addressed in the listing? [40 CFR 268.9(a); 40 CFR 262.11(c)]

Yes ☐ No ☐ NA ☐

If No, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____
_____	_____
_____	_____
_____	_____

**B. Does the facility handle the following wastes (national capacity variances)?**

1. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☐ List \_\_\_\_\_

2. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☐ List \_\_\_\_\_

3. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☐ List \_\_\_\_\_

4. Inorganic solid debris as defined in 40 CFR 268.2(g); includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☐ List \_\_\_\_\_

5. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☐ List \_\_\_\_\_

6. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92). [40 CFR 268.35(d)]

Yes ☐ No ☐ List \_\_\_\_\_

Section I. Comments: \_\_\_\_\_  
\_\_\_\_\_

## II. STORAGE FACILITY REQUIREMENTS

### A. Waste Analysis

1. Has CCF amended their waste analysis plan to address LDR treatment standards? [40 CFR 264.13(b)]

Yes \_\_\_\_\_ No \_\_\_\_\_

Note date of most recent amendment: \_\_\_\_\_

Note: Questions 2-4 apply both to incoming waste shipments and wastes generated on site. These analyses are not required for wastes manifested off site as exceeding treatment standards as long as they are correctly identified.

2. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP), or the extraction procedure if allowed? [40 CFR 268.40; 40 CFR 264.13(a)(1&2)]

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

3. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? [40 CFR 268.40; 40 CFR 264.13(a)(1&2)]

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

4. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.A. Comments: \_\_\_\_\_  
\_\_\_\_\_

### B. Operating Record

Note: Records are to be retained until closure.

1. Does the operating record contain records and results of LDR waste analyses? [40 CFR 264.73(b)(3)]

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Does the operating record contain copies of generator LDR notifications and certifications? [40 CFR 264.73(b)(15)]

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.B. Comments: \_\_\_\_\_  
\_\_\_\_\_



**C. Storage**

**1. Containers**

a. Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Have wastes been stored for less than one year since the applicable LDR treatment standards went into effect? [40 CFR 268.50(a)(2)(i)]

Yes \_\_\_\_\_ No \_\_\_\_\_

If Yes, check here \_\_\_\_\_ and go to question 3.

c. Can the facility show that storage over one year is necessary to facilitate proper treatment, recovery, or disposal? [40 CFR 268.50(c)]

Yes \_\_\_\_\_ No \_\_\_\_\_

**2. PCB Storage**

a. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes \_\_\_\_\_ No \_\_\_\_\_

If No, check here \_\_\_\_\_ and go to section D.

b. Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes \_\_\_\_\_ No \_\_\_\_\_

Section II.C. Comments: \_\_\_\_\_  
\_\_\_\_\_

**D. Dilution Prohibition:**

1. Are prohibited wastes with different treatment standards mixed?

Yes \_\_\_\_\_ No \_\_\_\_\_

2. If Yes, are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

Section II.D. Comments: \_\_\_\_\_  
\_\_\_\_\_

**E. RCRA Exempt Treatment**

1. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are

managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes \_\_\_ No \_\_\_ NA \_\_\_

2. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

Section II.E. Comments: \_\_\_\_\_

**F. Off-Site Management:**

1. Shipments to Treatment or Storage Facilities

Note: Wastes subject to variances or extensions are addressed in checklist section F.3.

a. Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes \_\_\_ No \_\_\_

If No, check here \_\_\_ and go to question 2.

b. Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes \_\_\_ No \_\_\_

c. If alternative treatment standards are specified for lab packs, is the required certification included with the notification? [40 CFR 268.7(a)(7) or (8)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

2. Shipments to Disposal Facilities

a. Are wastes shipped to off-site Subtitle C disposal facilities?

Yes \_\_\_ No \_\_\_

If No, check here \_\_\_ and go to question 2.d.

b. Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)]

Yes \_\_\_ No \_\_\_

c. If alternative treatment standards are specified for lab packs, is the required certification included with the notification? [40 CFR 268.7(a)(7) or (8)]

Yes \_\_\_ No \_\_\_ NA \_\_\_





ATTACHMENTS A-B

COLUMBUS COATED FABRICS

(OHD 004 294 351)

# SAMPLING EQUIPMENT FOR PARTICULAR WASTE TYPES

Waste type	Waste location or container								
	Drum	Sacks and bags	Open bed truck	Closed bed truck	Storage tanks or bins	Waste piles	Ponds, lagoons, & pits	Conveyor belt	Pipe
Free flowing liquids and slurries	Collwasa	N/A	N/A	Collwasa	Weighted bottle	N/A	Dipper	N/A	Dipper
Sludges	Trier	N/A	Trier	Trier	Trier	a	a		
Moist powders or granules	Trier	Trier	Trier	Trier	Trier	Trier	Trier	Shovel	Dipper
Dry powders or granules	Thief	Thief	Thief	Thief	Thief	Thief	Thief	Shovel	Dipper
Sand or packed powders and granules	Auger	Auger	Auger	Auger	a	a	a	Dipper	Dipper
Large grained solids	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Trier	Dipper

<sup>a</sup>This type of sampling situation can present significant logistical sampling problems, therefore sampling equipment must be specifically selected or designed based on site and waste conditions. No general statement about appropriate sampling equipment can be made.

Attachment A-1

Solids Test

A stick is pushed into the material and removed. If any free liquid drips off the stick after removal, it is considered liquid. If the stick is dry or the sludge is of mayonaise consistency, the material is considered solid. If a small quantity of free liquid exists, absorbent material and/or ashes are added and stirred into the sludge until it is determined by the stick test the material is solid.

This test is as prescribed by the landfill operator (CECOS Inc., Williamsburg, Ohio).

## SAMPLING METHODS

### Attachment A-3

#### Dust Stop/Still Bottom Wastes - Solid Wastes - Samples are

taken from (6) random drums with a trier as shown on Pg. 38d (from SW-846) by the procedure described on Pg. 38e (from SW-846). A composite is then sent to the lab for analysis in glass jars. No preservatives are required or used.

#### Dust Stop/Still Bottom Wastes - Liquid Wastes - Samples

are taken from (6) random drums with a Coliwasa as shown on Pg. 38f (from SW-846) by the procedure described on Pg. 38g (from SW-846). A composite is then sent to the lab for analysis in glass jars. No preservatives are required or used.

#### Electroplating Waste - A grab sample is taken from

the pit with a Dipper as shown on Pg. 38h (from SW-846) by the procedure described on Pg. 38i (from SW-846). The sample is then sent to the lab in a glass jar. No preservatives are required or used.



#### Procedure

#### Attachment A-3 cont'd.

1. Clean trier.
2. Insert trier into waste material 0 to 45° from horizontal. Rotate trier to cut a core of the waste. Remove trier with concave side up and transfer sample to container.

#### 1.2.1.6 Auger

##### Scope and Application

An auger consists of sharpened spiral blades attached to a hard metal central shaft. An auger samples hard or packed solid wastes or soil.

##### Apparatus

Augers are available at hardware and laboratory supply stores.

#### Procedure

1. Clean sampler.
2. Bore a hole through the middle of an aluminum pie pan large enough to allow the blade of the auger to pass through. The pan will be used to catch the sample brought to the surface by the auger.
3. Place pan against the sampling point. Auger through the hole in the pan until the desired sampling depth is reached. Back off the auger and transfer the sample in the pan and adhering to the auger to a container. Spoon out the rest of the loosened sample with a sample trier.

#### 1.2.1.7 Scoop and Shovel

##### Scope and Application

Scoops and shovels are used to sample granular or powdered material in bins, shallow containers and conveyor belts.

##### Apparatus

Scoops are available at laboratory supply houses. Flat-nosed shovels are available at hardware stores.

#### Procedure

1. Clean Coliwasa.
2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block.
3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.
4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the T-handle until it is upright and one end rests on the locking block.
5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.

### 1.2.1.2 Weighted Bottle

## Attachment A-3 cont'd.

#### Scope and Application

This sampler consists of a glass or plastic bottle, sinker, stopper, and a line which is used to lower, raise, and open the bottle. The weighted bottle samples liquids and free-flowing slurries.

#### General Comments and Precautions

1. Do not use a nonfluorocarbon plastic bottle to sample wastes containing organic materials.
2. Do not use a glass bottle to sample wastes that contain hydrofluoric acid.
3. Before sampling, ensure that the waste will not corrode the sinker, bottle holder, or line.

#### Apparatus

A weighted bottle with line is built to the specifications in ASTM Methods D 270 and E 300. Figure 2 shows the configuration of a weighted bottle sampler.

#### Procedure

1. Clean bottle.
2. Assemble weighted bottle sampler.
3. Lower the sampler to directed depth and pull out the bottle stopper by jerking the line.
4. Allow bottle to fill completely as evidenced by cessation of air bubbles.
5. Raise sampler, cap, and wipe off with a disposable cloth. The bottle can serve as a sample container.

### 1.2.1.3 Dipper

#### Scope and Application

The dipper consists of a glass or plastic beaker clamped to the end of a 2- or 3-piece telescoping aluminum or fiberglass pole which serves as the handle. A dipper samples liquids and free-flowing slurries.

#### General Comments and Precautions

1. Do not use a nonfluorocarbon plastic beaker to sample wastes containing organic materials.
2. Do not use a glass beaker to sample wastes of high pH or wastes that contain hydrofluoric acid.
3. Paint aluminum pole and clamp with a 2-part epoxy or other chemical-resistant paint when sampling either alkaline or acidic wastes.

#### Apparatus

Dippers are not available commercially and must be fabricated to conform to the specifications detailed in Figure 3. Table 3 lists the parts required to fabricate a dipper.

#### Procedure

1. Clean beaker, clamp, and handle.
2. Assemble dipper by bolting adjustable clamp to the pole. Place beaker in clamp and fasten shut.
3. Turn dipper so the mouth of the beaker faces down and insert into waste material. Turn beaker right side up when dipper is at desired depth. Allow beaker to fill completely as shown by the cessation of air bubbles.
4. Raise dipper and transfer sample to container.

## INSPECTION SCHEDULE - CCF

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety & emergency equipment	Sand	Out of stock	Weekly/as needed
	Portable sump pump	Availability; functional	Weekly
	Telephone	Functional	Daily
	Fire Hose	Leaks; water pressure	Daily
	Sprinkler system	Leaks; water pressure	Daily
	Emergency shower	Leaks; functional; water pressure	Weekly
	First aid equipment and supplies	Items out of stock	Weekly
Security devices	Facility fence	Damage to chain link structure	Weekly
	Container storage bldg. door	Damage to structure	Daily
Operating and structural equipment	Solvent still and related equipment	Sump freeboard; leaks in system	Daily
Container storage area	Container placement and stacking	Unobstructed aisle space; height of stacks; segregation of waste types	Daily
	Sealing of containers	Drums without lids; loose lids	Daily
	Labeling of containers	Improper identification	Daily
	Containers	Corrosion; leakage; structural defects	Daily
	Pallets	Damaged	Daily
	Base or foundation, ramp	Severe cracks or deterioration; settling	Daily
	Sump area	Debris; deterioration	Daily
	Warning signs	Damaged; obstructed	Daily
	Waste storage bldg.	Roof, window integrity	Daily
	General waste storage area	Debris; unlabeled drums; drums out of place; obstructions to normal drum handling	Daily
	Brass or bronze tools	Availability; functional	Daily
Loading/unloading dock	Spill control sand	Out of stock	Weekly
	Obstructions to drum handling	Debris; standing obstructions, snow, ice, wet or oily surfaces	Daily
	Barrel truck	Functional	Weekly

Attachment A-4

EMERGENCY EQUIPMENT

ITEM	LOCATION	DESCRIPTION/CAPABILITIES
Sand	.Drum storage building .End of loading dock .End of Parker Street	Dry sand for the control of spills
Shovel	.Drum storage building .End of Parker Street	Handling of sand and contaminated solids
Portable Sump Pumps	.Maintenance storage area	Electric pumps for movement of spilled liquids from sump
Telephone	.Solvent still area (adjacent to hazardous waste storage building)	Explosion-proof; communication access to Emergency Coordinator and response personnel
Fire Hose	.North wall of Building 66 (across Parker St. from storage building)	75 feet of 1 1/2" hose (capable of storage building coverage) 50 gpm discharge capacity
Sprinkler System	.Inside hazardous waste storage building	Exceeds "high hazard protection" (69 ft <sup>2</sup> floor space per sprin. head) 50 gpm discharge capacity
Fire Extinguisher	.Inside hazardous waste storage building	15 lb. CO <sub>2</sub> ; Cover AB & C fires A-wood, cloth, paper B-flammable liquids C-electrical
Fire Alarm	.Outside wall of Building 36; approx. 50 ft. from entrance of drum storage building	Notify Fire Dept.

Attachment B-1

Attachment B-2

- (g) The off-site treatment and disposal facilities to which waste will be taken, are as follows:

Disposal

CECOS International, Inc.  
Williamsburg, OH  
EPA ID# OHDO87433744

Incineration

Ross Incineration Services  
Grafton, OH  
EPA ID# OHDO48415665

Treatment (Liquids)

Systech Liquid Treatment Corporation  
Hillard, OH  
EPA ID# OHDO81290611

- (h) Transporters of the waste will be:

Acme Liquid Waste  
Westerville, OH  
EPA ID# OHDO00772723

CECOS (Cer) Transport  
Cincinnati, OH  
EPA ID# OHDO87433744

Ross Transportation Services  
Grafton, OH  
EPA ID# OHDO980614374

D-10

ACTIVITY	Days																	
	10	20	30	40	50	60	70	80	90	100	110	120	130	140	150	160	170	180
1. Generation of final volume of process hazardous waste																		
2. Removal/disposal of final process waste inventory.																		
3. Removal/disposal of clean-up waste.																		
4. Dismantling and decontamination of solvent still and appurtenances																		
5. Decontamination of storage area and waste handling areas																		
6. Decontamination of Banbury mixers																		
7. Decontamination of Electroplating sump																		
8. Completion of closure and certification submitted to Region V and Ohio EPA																		

CLOSURE SCHEDULE

- NOTE: 1. Disposal of final waste inventory includes the hazardous wastes generated due to the cleanup process.
2. This process continues throughout most of the closure schedule.

Attachment B-3

Attachment B-4

<u>U.S. EPA Hazardous Waste Number</u>	<u>Hazardous Waste Description</u>
D006	Dust stop waste
F002	Spent halogenated solvents, such as methylene Chloride and 1,1,1 trichloroethane
F003	Spent non-halogenated solvents, such as cyclohexanone
F005	Still bottoms from recovery of spent non-halogenated solvents
F006	Electroplating sludge

OPERATING FOREMEN

- a. Activate the area fire alarm, call Emergency Squad (dial 9-221-234 in case of personal injuries call First Aid (dial 6040 or 6058).
- b. Report disaster emergencies other than fire and explosion on the company public address system, dial 7 and report the type of emergency and the location of emergency. Repeat the announcement at least 2 times.
- c. Notify the main gate guard (call 6213) of the location of the emergency and the arrival of the Emergency Squad.
- d. Shall direct the shut down of necessary equipment to minimize danger and loss.
- e. Evacuate all personnel, not needed in the emergency, via the designated evacuation route, to the designated assembly area and account for all personnel that report to him.
- f. Contact departmental superintendent or request guard to do so.



EMERGENCY BRIGADE

- a. Immediately following the fire alarm or reporting of an emergency, members of the Emergency Brigade will report to the emergency area to execute orders under the direction of the ranking Brigade member.
- b. Members of the Emergency Brigade with special assignments shall proceed to their assigned posts and execute the special duties and remain there until relieved by Brigade Chief unless otherwise instructed.
  - 1. Sprinkler valves
  - 2. Gate men
- c. The Emergency Brigade will fight fires in the incipient stages only. Upon the arrival of the City Firemen and equipment, Emergency Brigade members shall be relieved of fire fighting duties.
- d. The Emergency Brigade will assist in salvage and clean up duties and other assignments as directed by the operating foreman to minimize danger and loss.
- e. A Brigade member shall be designated to meet emergency fire equipment at gate nearest to emergency area.

**SHIFT MAINTENANCE FOREMAN**

a. Immediately following the fire alarm or reporting of an emergency, shift maintenance supervisors shall report to the emergency area and direct the necessary maintenance activities.

1. In accordance with the pre-arranged plan:

Ensure an electrician is dispatched to man the fire pump.

Ensure a pipe fitter is dispatched to man the sprinkler valve controlling the fire area.

Shut off flammable gas and liquid systems in the emergency area.

SECURITY GUARDS

- a. Guards will announce the arrival of City Fire Equipment and Emergency Squads and direct equipment to plant entrance nearest the emergency area.
- b. Guards will permit only authorized personnel and emergency vehicles to enter the plant.
- c. Guards, when authorized by supervision, will call persons as listed on the Emergency Call list.
- d. Guards will remain at the phone in the Main Gate House to assure all areas receive the emergency call.
- e. All media representatives shall be directed to the Personnel Manager.

**1. PLANT MANAGER/DEPARTMENTAL SUPERINTENDENTS**

- a. Assume direction of emergency activities.**

**2. SAFETY/SECURITY MANAGER**

- a. Coordinate the loss control activities.**

**3. FIRST AID ATTENDANTS**

- a. Direct all first aid activities.**
- b. Keep records of casualties and disposition of injured employees.**

**4. PERSONNEL MANAGER**

- a. Obtain authorization to coordinate arrangements for News Releases and Media inquiries.**
- b. Ensure the notification of families of injured or hospitalized employees.**

**5. MAINTENANCE SUPERINTENDENT**

- a. Ensure proper shut down of necessary equipment.**
- b. Direct all emergency repair.**

STORAGE AREA CRITERIA

1. The entire Hazardous Waste Storage Building is separate from the main factory complex by a concrete roadway in the west side and a concreted area approximately 15 ft wide on the north side.
2. The Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. The sprinkler system heads are located for a coverage in excess of "high hazard protection" (a maximum of 69 sq ft of floor space per sprinkler head).
3. In addition to the sprinkler system, a 1½ inch, 75 foot wall mounted fire hose reel is available connected to the internal fire system of the facility. This is located directly across the roadway west of the Hazardous Waste Storage Building. This hose will reach to the center of the Storage Building.
4. The storage building is easily accessible for fire fighting vehicles and equipment for both City fire fighting equipment and the plant fire brigade. See Map Pg. 66a for Access Route. The fire brigade will fight any fire until outside assistance has arrived.

FIRE/EXPLOSION PROCEDURES

- (1) Fire doors in adjacent area will be closed.
- (2) Hazardous work in the area will be shut down immediately.
- (3) All equipment in the area will be shut down, as necessary and practical.
- (4) The Emergency Coordinator will be contacted (see Page 59).
- (5) The area will be cleared of all personnel not actively involved in fighting the fire.
- (6) All injured persons will be removed, and medical treatment will be administered by qualified personnel.

# **COMPLETENESS/TECHNICAL REVIEW CHECKLIST**





Facility Name: Columbus Coated Fabrics  
 ID No.: OHD004294351  
 Date Part B Received: June 30, 1989  
 Date Review Due: October 31, 1989

**COMPLETENESS/TECHNICAL EVALUATION CHECKLIST**

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
A. PART A APPLICATION		<u>N</u>	<u>      </u>	<u>1-4</u>	<u>      </u>	<u>Part A Application</u>
B. FACILITY DESCRIPTION						
B-1	General description	<u>Y</u>	<u>      </u>	<u>      </u>		<u>General Descrip- tion of Facility</u>
B-2	Topographic map					<u>Topographic Maps &amp; Other Reg. Maps</u>
B-2a	General requirements	<u>N</u>	<u>      </u>	<u>5</u>	<u>      </u>	<u>"</u>
B-2b	Additional requirements for land disposal facilities	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
B-3a	Seismic standard	<u>"</u>	<u>      </u>	<u>      </u>		<u>Facility Location Information</u>
B-3b	Floodplain standard	<u>Y</u>	<u>      </u>	<u>      </u>		<u>Topographic Maps &amp; Other Reg. Maps</u>
B-3b(1)	Demonstration of compliance	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
B-3b(1)(a)	Flood proofing & flood protection measures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
B-3b(1)(b)	Flood plan	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
B-3b(2)	Plan for future compliance with floodplain standard	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
B-3b(3)	Waiver for land storage and disposal facilities	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
B-4	Traffic information	<u>N</u>	<u>      </u>	<u>      </u>	<u>6</u>	<u>Traffic Patterns</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
<b>C. WASTE CHARACTERISTICS</b>						
C-1	Chemical & physical analyses, including sampling/analysis methods	<u>N</u>	<u>      </u>	<u>7</u>	<u>      </u>	<u>Hazardous Waste Anal.</u>
C-1a	Containerized wastes	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
C-1b	Waste in tank systems	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-1c	Waste in piles	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-1d	Landfilled wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-1e	Wastes incinerated and wastes used in performance tests	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-1f	Wastes to be land treated	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-1g	Waste in miscellaneous units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-2	Waste analysis plan					<u>Waste Anal. Plan</u>
C-2a	Parameters & rationale	<u>N</u>	<u>      </u>	<u>8</u>	<u>      </u>	<u>Page 14-15</u>
C-2b	Test methods	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Page 3-4</u>
C-2c	Sampling methods	<u>N</u>	<u>      </u>	<u>9</u>	<u>      </u>	<u>Page 5-11</u>
C-2d	Frequency of analyses	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Page 1 &amp; 13</u>
C-2e	Additional requirements for wastes generated off-site	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
C-2f	Additional requirements for ignitable, reactive or incompatible wastes	<u>N</u>	<u>      </u>	<u>10</u>	<u>      </u>	<u>"</u>
C-3	Waste analysis requirements pertaining to land disposal restrictions					<u>Waste Anal. Plan</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C-3a	Waste characterization	<u>N</u>	<u>      </u>	<u>10</u>	<u>      </u>	<u>Waste Anal. Plan</u>
C-3b	Sampling and analytical procedures	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3c	Frequency of analysis	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
C-3d	Additional requirements for treatment facilities					<u>Not in Permit</u>
C-3d(1)	Off-site facilities	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3d(2)	Analysis of treatment residues	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3d(3)	Sampling and analytical procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3d(4)	Frequency of analysis	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3e	Additional requirements for disposal facilities					<u>"</u>
C-3e(1)	Off-site facilities	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3e(2)	Analysis of waste or waste treatment residues	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3e(3)	Sampling and analytical procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3e(4)	Frequency of analysis	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3f	Additional requirements for surface impoundments exempted from land dis- posal restrictions					<u>"</u>
C-3f(1)	Sampling and analysis of impoundments contents	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3f(2)	Annual removal of residues	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
C-3g	Requirements for land disposal facilities with an approved exemption or extension	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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#### D. PROCESS INFORMATION

					<u>Special In- formation Requirements</u>
D-1	Containers				
D-1a	Containers with free liquids				"
D-1a(1)	Description of containers	<u>N</u>	<u>12</u>		"
D-1a(2)	Container management practices	<u>"</u>	<u>13</u>		"
D-1a(3)	Secondary containment system design and operation				"
D-1a(3)(a)	Requirement for the base or liner to contain liquids	<u>"</u>	<u>14</u>		"
D-1a(3)(b)	Containment system drainage	<u>Y</u>			"
D-1a(3)(c)	Containment system capacity	<u>"</u>			"
D-1a(3)(d)	Control of run-on	<u>"</u>			"
D-1a(3)(e)	Removal of liquids from containment systems	<u>"</u>			<u>Contingency Plan</u>
D-1b	Containers without free liquid				<u>Not in Permit</u>
D-1b(1)	Test for free liquids	<u>N/A</u>			"
D-1b(2)	Description of containers	<u>"</u>			"
D-1b(3)	Container management practices	<u>"</u>			"
D-1b(4)	Container storage area drainage	<u>"</u>			"
D-2	Tanks systems				"
D-2a	Existing tanks systems				"
D-2a(1)	Assessment of existing tank system integrity	<u>"</u>			"





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-2a(2)	External corrosion practices	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-2b	New tank systems					<u>"</u>
D-2b(1)	Assessment of new tank system integrity	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2b(2)	External corrosion protection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2b(3)	Description of tank system installation & testing plans & procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2c	Dimensions & capacity of each tank	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2d	Description of feed systems, safety cutoff, bypass systems, & pressure control	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2e	Diagram of piping, instrumentation, & process flow for each tank system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2f	Containment & detection of releases					<u>"</u>
D-2f(1)	Plans and description of the design, construction, & operation of the secondary containment system for each tank system					<u>"</u>
D-2f(1)(a)	Tank age determination	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2f(1)(b)	Requirements for secondary containment & leak detection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-2f(1)(c)	Requirements for an external liner, vault, double-walled tank or equivalent device	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-2f(1)(d) Secondary containment & leak detection requirements for ancillary equipment	N/A	_____	_____	_____	Not in Permit
D-2f(2) Requirements for tank systems until secondary containment is implemented	"	_____	_____	_____	"
D-2f(3) Variance from secondary containment requirements					"
D-2f(3)(a) Variance based on a demonstration of equivalent protection of ground-water & surface water	"	_____	_____	_____	"
D-2f(3)(b) Variance based on a demonstration of no substantial present or potential hazard	"	_____	_____	_____	"
D-2f(3)(c) Exemption based on no free liquids & location inside a building	"	_____	_____	_____	"
D-2g Controls & practices to prevent spills & overflow	"	_____	_____	_____	"
D-3 Waste piles					"
D-3a List of wastes	"	_____	_____	_____	"
D-3b Liner exemption					"
D-3b(1) Enclosed dry piles	"	_____	_____	_____	"
D-3b(1)(a) Protection from precipitation	"	_____	_____	_____	"
D-3b(1)(b) Free liquids	"	_____	_____	_____	"
D-3b(1)(c) Run-on protection	"	_____	_____	_____	"
D-3b(1)(d) Wind dispersal control	"	_____	_____	_____	"
D-3b(1)(e) Leachate generation	"	_____	_____	_____	"
D-3b(2) Alternate Design/No Migration	"	_____	_____	_____	"



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
						<u>Not in Permit</u>
D-3c	Liner engineering report					
D-3c(1)	Liner description	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(2)	Liner location relative to high water table	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(3)	Calculation of necessary soil liner thickness	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(4)	Liner strength requirements	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(5)	Liner strength demonstration	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(6)	Liner/waste compati- bility testing results	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(7)	Liner installation					<u>"</u>
D-3c(7)(a)	Synthetic liner seaming	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(7)(b)	Soil liner compaction	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(7)(c)	Installation inspection/ testing programs	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(8)	Liner coverage	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(9)	Liner exposure prevention	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3c(10)	Synthetic-liner bedding	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d	Liner foundation report					<u>"</u>
D-3d(1)	Liner foundation design description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(2)	Subsurface exploration data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(3)	Laboratory testing data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(4)	Engineering analyses					<u>"</u>
D-3d(4)(a)	Settlement potential	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(4)(b)	Bearing capacity and stability	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-3d(4)(c)	Potential for bottom heave or blowout	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-3d(4)(d)	Construction and operational loadings	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(5)	Foundation installation procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3d(6)	Foundation installation inspection program	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e	Leachate collection and removal system					<u>"</u>
D-3e(1)	System design and operation	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e(2)	Chemical resistance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e(3)	Strength of materials	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e(4)	Prevention of clogging	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e(5)	Installation	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3e(6)	Maintenance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3f	Run-on control system					<u>"</u>
D-3f(1)	Calculation of peak flow	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3f(2)	Design and performance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3f(3)	Construction	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3f(4)	Maintenance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3g	Run-off control system					<u>"</u>
D-3g(1)	Calculation of peak flow	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3g(2)	Design and performance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3g(3)	Construction	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3g(4)	Maintenance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3h	Management of collec- tion and holding units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-3i	Control of wind dispersal	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-3j	Groundwater monitoring exemption					<u>"</u>
D-3j(1)	Engineered structure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(2)	No liquid waste	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(3)	Exclusion of liquids	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(4)	Containment system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(5)	Leak detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(6)	Operation of leak detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3j(7)	No migration	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3k	Treatment within the pile					<u>"</u>
D-3k(1)	Treatment process description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3k(2)	Equipment used	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3k(3)	Residuals description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3l	Special management plan for piles containing wastes F020, F021, F022, F023, F026, and F027					<u>"</u>
D-3l(1)	Waste description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3l(2)	Soil description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3l(3)	Mobilizing properties	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-3l(4)	Additional management techniques	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4	Surface impoundments					<u>"</u>
D-4a	List of wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4b	Liner system exemption requests					<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4b(1)	Exemption based on existing portion	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-4b(2)	Exemption based on alternative design and location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4c	Liner system, general items					<u>"</u>
D-4c(1)	Liner system description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4c(2)	Liner system location relative to high water table	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4c(3)	Loads on liner system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4c(4)	Liner system coverage	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4c(5)	Liner system exposure prevention	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d	Liner system foundation					<u>"</u>
D-4d(1)	Foundation description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d(2)	Subsurface exploration data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d(3)	Laboratory testing data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d(4)	Engineering analyses					<u>"</u>
D-4d(4)(a)	Settlement potential	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d(4)(b)	Bearing capacity	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4d(4)(c)	Potential for excess hydrostatic or gas pressure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4e	Liner systems, liners					<u>"</u>
D-4e(1)	Synthetic liners	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4e(1)(a)	Synthetic liner compatibility data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4e(1)(b)	Synthetic liner strength	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4e(1)(c) Synthetic liner bedding	N/A				Not in Permit
D-4e(2) Soil liners	"				"
D-4e(2)(a) Material testing data	"				"
D-4e(2)(b) Soil liner compatibility data	"				"
D-4e(2)(c) Soil liner thickness	"				"
D-4e(2)(d) Soil liner strength	"				"
D-4f Liner system, leachate detection system					"
D-4f(1) System operation and design	"				"
D-4f(2) Equivalent capacity	"				"
D-4f(3) Grading and drainage	"				"
D-4f(4) System compatibility	"				"
D-4f(5) System strength					"
D-4f(5)(a) Stability of drainage layers	"				"
D-4f(5)(b) Strength of piping	"				"
D-4f(6) Prevention of clogging	"				"
D-4g Liner system, construc- tion and maintenance					"
D-4g(1) Material specifications					"
D-4g(1)(a) Synthetic liners	"				"
D-4g(1)(b) Soil liners	"				"
D-4g(1)(c) Leachate detection system	"				"
D-4g(2) Construction specifications					"
D-4g(2)(a) Liner system foundation	"				"
D-4g(2)(b) Soil liner	"				"



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4g(2)(c) Synthetic liners	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-4g(2)(d) Leachate detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4g(3) Construction quality control program	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4g(4) Maintenance procedures for leachate detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4g(5) Liner repairs during operations	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4h Prevention of over- topping					<u>"</u>
D-4h(1) Design features	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4h(2) Operating procedure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4h(3) Overtopping prevention	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4h(4) Freeboard requirements	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4h(5) Outflow destination	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i Dike stability					<u>"</u>
D-4i(1) Engineer's certification	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(2) Dike design description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(3) Erosion and piping protection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(4) Subsurface soil conditions	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(5) Stability analysis	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(6) Strength and con- solidation test results	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(7) Dike construction procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-4i(8) Dike construction inspection program	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4j	Special waste management plan for surface impoundments containing wastes F020, F021, F022, F023, F026, and F027					Not in Permit
D-4j(1)	Waste description	N/A				"
D-4j(2)	Soil description	"				"
D-4j(3)	Mobilizing properties	"				"
D-4j(4)	Additional management techniques	"				"
D-5	Incinerators					"
D-5a	Justification for exemption	"				"
D-5b	Trial burn					"
D-5b(1)	New incinerator start-up/shakedown conditions (reserved)	"				"
D-5b(2)	Trial burn plan					"
D-5b(2)(a)	Engineering description of incinerator	"				"
D-5b(2)(b)	Sampling, analysis and monitoring procedures including QA/QC plan	"				"
D-5b(2)(c)	Trial burn schedule	"				"
D-5b(2)(d)	Test protocols	"				"
D-5b(2)(e)	Pollution control equipment operation	"				"
D-5b(2)(f)	Shutdown procedures	"				"
D-5b(2)(g)	New incinerator post-trial burn operation (reserved)	"				"
D-5c	Data in lieu of trial burn					"
D-5c(1)	Engineering description of incinerator	"				"



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-5c(2)	Expected incinerator operation	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-5c(3)	Design and operating condition comparisons	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-5c(4)	Results of previous trial burns					<u>"</u>
D-5c(4)(a)	Sampling and analysis techniques	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-5c(4)(b)	Methods and results	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-5d	Determinations	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6	Landfills					<u>"</u>
D-6a	List of wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b	Liner system exemption requests					<u>"</u>
D-6b(1)	Exemption based on existing portion	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(2)	Exemption based on alternative design & location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(3)	Exemption for monofills	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)	Groundwater monitoring exemption					<u>"</u>
D-6b(4)(a)	Engineered structure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(b)	No liquid waste	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(c)	Exclusion of liquids	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(d)	Containment system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(e)	Leak detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(f)	Operation of leak detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6b(4)(g)	No migration	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6c	Liner system, general items					<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6c(1)	Liner system description	N/A	_____	_____	_____	Not in Permit
D-6c(2)	Liner system location relative to high water table	"	_____	_____	_____	"
D-6c(3)	Loads on liner system	"	_____	_____	_____	"
D-6c(4)	Liner system coverage	"	_____	_____	_____	"
D-6c(5)	Liner system exposure prevention	"	_____	_____	_____	"
D-6d	Liner system, foundation					"
D-6d(1)	Foundation description	"	_____	_____	_____	"
D-6d(2)	Subsurface exploration data	"	_____	_____	_____	"
D-6d(3)	Laboratory testing data	"	_____	_____	_____	"
D-6d(4)	Engineering analysis					"
D-6d(4)(a)	Settlement potential	"	_____	_____	_____	"
D-6d(4)(b)	Bearing capacity	"	_____	_____	_____	"
D-6d(4)(c)	Stability of landfill slopes	"	_____	_____	_____	"
D-6d(4)(d)	Potential for excess hydrostatic or gas pressure	"	_____	_____	_____	"
D-6e	Liner system, liners					"
D-6e(1)	Synthetic liners	"	_____	_____	_____	"
D-6e(1)(a)	Synthetic liner compatibility data	"	_____	_____	_____	"
D-6e(1)(b)	Synthetic liner strength	"	_____	_____	_____	"
D-6e(1)(c)	Synthetic liner bedding	"	_____	_____	_____	"
D-6e(2)	Soil liners	"	_____	_____	_____	"
D-6e(2)(a)	Material testing data	"	_____	_____	_____	"
D-6e(2)(b)	Soil liner compatibility data	"	_____	_____	_____	"



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6e(2)(c)	Soil liner thickness	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-6e(2)(d)	Soil liner strength	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f	Liner system, leachate collection/detection systems					<u>"</u>
D-6f(1)	System operation and design	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(2)	Equivalent capacity	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(3)	Grading and drainage	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(4)	Maximum leachate head	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(5)	System compatibility	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(6)	System strength					<u>"</u>
D-6f(6)(a)	Stability of drainage layers	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(6)(b)	Strength of piping	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6f(7)	Prevention of clogging	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g	Liner system, construction and maintenance					<u>"</u>
D-6g(1)	Material specifications					<u>"</u>
D-6g(1)(a)	Synthetic liners	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(1)(b)	Soil liners	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(1)(c)	Leachate collection/detection systems	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(2)	Construction specifications					<u>"</u>
D-6g(2)(a)	Liner system foundation	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(2)(b)	Soil liner	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(2)(c)	Synthetic liners	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(2)(d)	Leachate collection/detection systems	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6g(3)	Construction quality control program	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-6g(4)	Maintenance procedures for leachate collection/detection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6g(5)	Liner repairs during operations	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h	Run-on and run-off control systems					<u>"</u>
D-6h(1)	Run-on control system					<u>"</u>
D-6h(1)(a)	Design and performance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(1)(b)	Calculation of peak flow	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(2)	Run-off control system					<u>"</u>
D-6h(2)(a)	Design and performance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(2)(b)	Calculation of peak flow	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(3)	Management of collection and holding units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(4)	Construction	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6h(5)	Maintenance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6i	Control of wind dispersal	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j	Liquids in landfills					<u>"</u>
D-6j(1)	Bulk or noncontainerized free liquids	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(2)	Containers holding free liquids	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(3)	Restriction to small containers	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(4)	Nonstorage containers	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(5)	Labpacks					<u>"</u>
D-6j(5)(a)	Inside containers	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6j(5)(b)	Overpack	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-6j(5)(c)	Absorbent material	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(5)(d)	Incompatible wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6j(5)(e)	Reactive wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6k	Containerized wastes		<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6l	Special waste management plan for landfills containing wastes F020, F021, F022, F023, and F027					<u>"</u>
D-6l(1)	Waste description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6l(2)	Soil description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6l(3)	Mobilizing properties	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-6l(4)	Additional management techniques	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7	Land treatment					<u>"</u>
D-7a	Treatment demonstration	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(1)	Demonstration wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(2)	Demonstration data sources	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(2)(a)	Existing literature	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(2)(b)	Operating data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(3)	Laboratory/field testing programs	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(3)(a)	Toxicity testing	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(3)(b)	Field plot testing	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7a(3)(c)	Laboratory testing	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b	Land treatment program	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b(1)	List of wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b(2)	Operating procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7b(2)(a) Waste application rates	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
D-7b(2)(b) Waste application methods	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b(2)(c) Control of soil pH	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b(2)(d) Enhancement of microbial or chemical reactions	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7b(2)(e) Control of soil moisture	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c Unsaturated zone monitoring plan	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1) Soil-pore liquid monitoring	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(a) Sampling location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(b) Sampling frequency	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(c) Sampling equipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(d) Sampling equipment installation	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(e) Sampling procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(f) Analytical procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(g) Chain of custody	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(h) Background values	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(i) Statistical methods	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(1)(j) Justification of Principle Hazardous Constituents	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2) Soil core monitoring	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2)(a) Sampling location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2)(b) Sampling frequency	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2)(c) Sampling equipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2)(d) Sampling procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7c(2)(e) Analytical procedures	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7c(2)(f) Chain of custody	N/A				Not in Permit
D-7c(2)(g) Background values	"				"
D-7c(2)(h) Statistical methods	"				"
D-7c(2)(i) Justification of Principle Hazardous Constituents	"				"
D-7d Treatment zone description	"				"
D-7d(1) Horizontal & vertical dimensions	"				"
D-7d(2) Soil survey	"				"
D-7d(3) Soil series descriptions	"				"
D-7d(4) Soil sampling data	"				"
D-7d(5) Seasonal high water table	"				"
D-7e Unit design, con- struction, operation, and maintenance					"
D-7e(1) Run-on control	"				"
D-7e(2) Run-off control	"				"
D-7e(3) Minimizing hazardous constituent run-off	"				"
D-7e(4) Management of accumulated run-on and run-off	"				"
D-7e(5) Control of wind dispersal	"				"
D-7f Food chain crops					"
D-7f(1) Food chain crop demonstration	"				"
D-7f(1)(a) Demonstration basis	"				"
D-7f(1)(b) Test procedures	"				"





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7f(2)	Cadmium-bearing wastes					<u>Not in Permit</u>
D-7f(2)(a)	Crops for human consumption	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7f(2)(b)	Animal feed	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7g	Waste management plan for land treatment units containing wastes F020, F021, F022, F023, F026, and F027					<u>"</u>
D-7g(1)	Waste description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7g(2)	Soil description	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7g(3)	Mobilizing properties	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7g(4)	Additional management techniques	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-7h	Incompatible wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8	Miscellaneous units					<u>"</u>
D-8a	Description of miscellaneous units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b	Environmental performance standards					<u>"</u>
D-8b(1)	Miscellaneous unit wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(2)	Containment system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(3)	Site air conditions	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(4)	Prevention of air emissions	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(5)	Operating standards	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(6)	Site hydrogeologic conditions	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(7)	Site precipitation	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
D-8b(8)	Groundwater usage	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-8b(9)	Surface waters	<u>N/A</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Not in Permit</u>
D-8b(10)	Area land use	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
D-8b(11)	Migration of waste constituents	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
D-8b(12)	Evaluation of risk to human health and the environment	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>



Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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E. GROUNDWATER MONITORING

E-1	Exemption from ground-water protection requirements				Not in Permit
E-1a	Waste piles				"
E-1b	Landfill	N/A			"
E-1c	No migration	"			"
E-2	Interim status period groundwater monitoring data	"			"
E-3	Aquifer identification	"			"
E-4	Contaminant plume description	"			"
E-5	Detection monitoring program	"			"
E-5a	Indicator parameters, waste constituents, reaction products to be monitored	"			"
E-5a(1)	Hazardous waste characterization	"			"
E-5a(2)	Behavior of constituents	"			"
E-5a(3)	Detectability	"			"
E-5b	Groundwater monitoring program	"			"
E-5b(1)	Description of wells	"			"
E-5b(2)	Representative samples	"			"
E-5b(3)	Locations of background groundwater monitoring wells that are not up-gradient	"			"
E-5c	Background values	"			"
E-5c(1)	Data currently available				"



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-5c(1)(a) Background groundwater quality data	N/A				Not in Permit
E-5c(1)(b) Sampling frequency	"				"
E-5c(1)(c) Sampling quantity	"				"
E-5c(1)(d) Background values	"				"
E-5c(2) Plan for establishing groundwater quality data					"
E-5c(2)(a) Well location	"				"
E-5c(2)(b) Sampling frequency	"				"
E-5c(2)(c) Sampling quantity	"				"
E-5c(2)(d) Background values	"				"
E-5d Sampling, analysis and statistical procedures	"				"
E-5d(1) Sample collection	"				"
E-5d(2) Sample preservation and shipment	"				"
E-5d(3) Analytical procedure	"				"
E-5d(4) Chain of custody	"				"
E-5d(5) Additional requirements for compliance point monitoring					"
E-5d(5)(a) Sample frequency	"				"
E-5d(5)(b) Compliance point groundwater quality values	"				"
E-5d(6) Annual determination	"				"
E-5d(7) Statistical determination	"				"
E-5d(7)(a) Statistical procedure	"				"
E-5d(7)(b) Results	"				"





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-6	Compliance monitoring program					Not in Permit
E-6a	Waste description	N/A				"
E-6b	Characterization of contaminated groundwater	"				"
E-6c	Hazardous constituents to be monitored	"				"
E-6d	Concentration limits	"				"
E-6e	Alternate concentration limits					"
E-6e(1)	Adverse effects on groundwater quality	"				"
E-6e(2)	Potential adverse effects	"				"
E-6f	Groundwater monitoring system					"
E-6f(1)	Description of wells	"				"
E-6f(2)	Representative samples	"				"
E-6f(3)	Locations of background groundwater monitoring wells that are not up-gradient					"
E-6f(3)(a)	Inability to determine upgradient	"				"
E-6f(3)(b)	Representative samples of background groundwater quality	"				"
E-6g	Background values					"
E-6g(1)	Date currently available					"
E-6g(1)(a)	Background groundwater quality data	"				"
E-6g(1)(b)	Sampling frequency	"				"
E-6g(1)(c)	Sampling quantity	"				"



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-6g(1)(d) Background values	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
E-6g(2) Plan for establishing groundwater quality data					<u>"</u>
E-6g(2)(a) Background data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6g(2)(b) Well location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6g(2)(c) Sampling frequency	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6g(2)(d) Sampling quantity	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6g(2)(e) Background values	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h Sampling, analysis and statistical procedures					<u>"</u>
E-6h(1) Sample collection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(2) Sample preservation and shipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(3) Analytical procedure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(4) Chain of custody	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(5) Additional requirements for compliance point monitoring					<u>"</u>
E-6h(5)(a) Sampling frequency	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(5)(b) Testing for Appendix VIII hazardous constituents	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(5)(c) Compliance point groundwater quality values	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(6) Annual determination	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(7) Statistical determination					<u>"</u>
E-6h(7)(a) Statistical procedure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-6h(7)(b) Results	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-7	Corrective action program					<u>Not in Permit</u>
E-7a	Characterization of contaminated groundwater	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7b	Concentration limits	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7c	Alternate concentration limits					<u>"</u>
E-7c(1)	Adverse effects on groundwater quality	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7c(2)	Potential adverse effects	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d	Corrective action plan					<u>"</u>
E-7d(1)	Location	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(2)	Construction detail	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(3)	Plans for removing wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(4)	Treatment technologies	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(5)	Effectiveness of correction program	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(6)	Reinjection system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(7)	Additional hydrogeologic data	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(8)	Operation & maintenance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7d(9)	Closure & post-closure plans	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7e	Groundwater monitoring program					<u>"</u>
E-7e(1)	Description of wells	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7e(2)	Representative samples	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7e(3)	Locations of background groundwater monitoring wells that are not up-gradient	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-7f	Background values					Not in Permit
E-7f(1)	Data currently available					"
E-7f(1)(a)	Background groundwater quality data	N/A				"
E-7f(1)(b)	Sampling frequency	"				"
E-7f(1)(c)	Sampling quantity	"				"
E-7f(1)(d)	Background values	"				"
E-7f(2)	Plan for establishing groundwater quality data					"
E-7f(2)(a)	Background data	"				"
E-7f(2)(b)	Well location	"				"
E-7f(2)(c)	Sampling frequency	"				"
E-7f(2)(d)	Sampling quantity	"				"
E-7f(2)(e)	Background values	"				"
E-7g	Sampling, analysis and statistical procedures					"
E-7g(1)	Sample collection	"				"
E-7g(2)	Sample preservation and shipment	"				"
E-7g(3)	Analytical procedure	"				"
E-7g(4)	Chain of custody	"				"
E-7g(5)	Additional requirements for compliance point monitoring					"
E-7g(5)(a)	Sampling frequency	"				"
E-7g(5)(b)	Testing for Appendix VIII hazardous constituents	"				"
E-7g(5)(c)	Compliance point ground- water quality values	"				"
E-7g(6)	Annual determination	"				"





		<u>Complete</u> <u>(Y/N)</u>	<u>Technically</u> <u>Adequate</u> <u>(Y/N)</u>	<u>See</u> <u>Attached</u> <u>Comment</u>	<u>See</u> <u>Attached</u> <u>Exhibit</u>	<u>Location of</u> <u>Information</u>
E-7g(7)	Statistical determination					<u>Not in</u> <u>Permit</u>
E-7g(7)(a)	Statistical procedure	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
E-7g(7)(b)	Results	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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F. PROCEDURES TO PREVENT HAZARDS

F-1	Security					<u>Security Re- quirements</u>
F-1a	Security procedures and equipment					"
F-1a(1)	24-hour surveillance system	<u>Y</u>				"
F-1a(2)	Barrier and means to control entry					"
F-1a(2)(a)	Barrier	<u>"</u>				"
F-1a(2)(b)	Means to control entry	<u>"</u>				"
F-1a(3)	Warning signs	<u>"</u>				"
F-1b	Waiver					<u>Not in Permit</u>
F-1b(1)	Injury to intruder	<u>N/A</u>				"
F-1b(2)	Violation caused by intruder	<u>"</u>				"
F-2	Inspection schedule					<u>Inspection Schedule</u>
F-2a	General inspection requirements	<u>Y</u>				"
F-2a(1)	Types of problems	<u>"</u>				"
F-2a(2)	Frequency of inspections	<u>"</u>				"
F-2b	Specific process inspection requirements					"
F-2b(1)	Container inspection	<u>"</u>				"
F-2b(2)	Tank system inspection					<u>Not in Permit</u>
F-2b(2)(a)	Tank system external corrosion and releases	<u>N/A</u>				"
F-2b(2)(b)	Tank system construction materials and surrounding area	<u>"</u>				"
F-2b(2)(c)	Tank system overfilling control equipment	<u>"</u>				"



	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-2b(2)(d) Tank system monitoring & leak detection equipment	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
F-2b(2)(e) Tank system cathodic protection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(2)(f) Tank condition assessment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(3) Waste pile inspection					<u>"</u>
F-2b(3)(a) Run-on and run-off control system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(3)(b) Wind dispersal system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(3)(c) Leachate collection and removal system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(4) Surface impoundment inspection					<u>"</u>
F-2b(4)(a) Condition assessment					<u>"</u>
F-2b(4)(a)(1) Overtopping control system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(4)(a)(2) Impoundment contents	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(4)(a)(3) Deterioration	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(4)(b) Structural integrity	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(5) Incinerator inspection					<u>"</u>
F-2b(5)(a) Incinerator & associated equipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(5)(b) Incinerator waste feed cutoff system and associated alarms	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(6) Landfill inspection					<u>"</u>
F-2b(6)(a) Run-on and run-off control system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(6)(b) Wind dispersal control system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(6)(c) Leachate collection and removal system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(7) Land treatment facility inspection					<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-2b(7)(a)	Run-on and run-off control system	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
F-2b(7)(b)	Wind dispersal control system	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-2b(8)	Misc. unit inspection	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-3	Waiver or documentation of preparedness & prevention requirements					<u>Security Requirements</u>
F-3a	Equipment requirements					<u>"</u>
F-3a(1)	Internal communications	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-3a(2)	External communications	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-3a(3)	Emergency equipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Contingency Plan</u>
F-3a(4)	Water for fire control	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-3b	Aisle space requirement	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Sp. Information Requirements</u>
F-4	Preventive procedures, structures, & equipment					<u>Procedures &amp; Equipment for Hazard Abatement</u>
F-4a	Unloading operations	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-4b	Run-off	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-4c	Water supplies	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-4d	Equipment and power failure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-4e	Personnel protection equipment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5	Prevention of reaction of ignitable, reactive, and incompatible wastes					<u>Ignition Precautions</u>
F-5a	Precautions to prevent ignition or reaction of ignitable or reactive wastes	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5b	General precautions for handling ignitable or reactive waste & mixing of incompatible waste	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-5c	Management of ignitable or reactive wastes in containers	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Ignition Precautions</u>
F-5d	Management of incompatible wastes in containers	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5e	Management of ignitable or reactive wastes in tank systems	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
F-5f	Management of incompatible wastes in tanks systems	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5g	Management of ignitable or reactive wastes placed in waste piles	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5h	Management of incom- patible wastes placed in waste piles	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5i	Management of ignitable or reactive wastes placed in surface im- poundments	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5j	Management of incom- patible wastes placed in surface impoundments	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5k	Management of ignitable or reactive wastes placed in landfills	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5l	Management of incom- patible wastes placed in landfills	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5m	Management of ignitable or reactive wastes placed in land treatment units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
F-5n	Management of incom- patible wastes placed in land treatment units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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G. CONTINGENCY PLAN

G-1	General information	<u>Y</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Contingency Plan</u>
G-2	Emergency coordinators	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Page 30</u>
G-3	Implementation	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Contingency Plan</u>
G-4	Emergency response procedures					<u>"</u>
G-4a	Notification	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Pgs. 31, 54</u>
G-4b	Identification of hazardous materials	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Page 16</u>
G-4c	Assessment	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Contingency Plan</u>
G-4d	Control procedures	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
G-4e	Prevention of recurrence or spread of fires, ex- plosions, or releases	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Pages 14, 15, 17</u>
G-4f	Storage & treatment of released material	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Page 15</u>
G-4g	Incompatible waste	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Pgs. 20, 28</u>
G-4h	Post-emergency equipment maintenance	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Pgs. 17 &amp; 18</u>
G-4i	Container spills and leakage	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Contingency Plan</u>
G-4j	Tank spills and leakage					<u>Not in Permit</u>
G-4j(1)	Tank spills and leakage	<u>N/A</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
G-4j(2)	Spills & leaks from tanks containing wastes F020, F021, F022, F023, F026, and F027	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
G-4k	Surface impoundments spills and leakage					<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
G-4k(1)	Emergency repairs					<u>Not in Permit</u>
G-4k(1)(a)	Stopping waste addition	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(1)(b)	Containing leaks	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(1)(c)	Stopping leaks	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(1)(d)	Preventing catastrophic failure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(1)(e)	Emptying the impoundment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(2)	Certification	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(3)	Repairs as a result of sudden drop	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(3)(a)	Existing portions of surface impoundment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
G-4k(3)(b)	Other portions of surface impoundment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
						<u>Contingency Plan</u>
G-5	Emergency equipment	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Pgs. 40-41</u>
G-6	Coordination agreements	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Page 55</u>
G-7	Evacuation plan	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Pgs. 42-53</u>
G-8	Required reports	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Page 54</u>



Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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# H. PERSONNEL TRAINING

H-1	Outline of the training program				<u>Personnel Training</u>
H-1a	Job title/job description	<u>N</u>	<u>          </u>	<u>15</u>	<u>          "</u>
H-1b	Training content, frequency, and techniques	<u>Y</u>	<u>          </u>	<u>          </u>	<u>Pgs. 13-15</u>
H-1c	Training director	<u>"</u>	<u>          </u>	<u>          </u>	<u>Page 5</u>
H-1d	Relevance of training to job position	<u>N</u>	<u>          </u>	<u>16</u>	<u>Pgs. 13-15, 19</u>
H-1e	Training for emergency response	<u>"</u>	<u>          </u>	<u>17</u>	<u>Page 13</u>
H-2	Implementation of training program	<u>Y</u>	<u>          </u>	<u>          </u>	<u>Page 17</u>





Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
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# I. CLOSURE AND POST-CLOSURE REQUIREMENTS

I-1	Closure plans				<u>Closure Plan</u>
I-1a	Closure performance standard	<u>Y</u>	<u>          </u>	<u>          </u>	<u>Page 2</u>
I-1b	Maximum waste inventory	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c	Disposal or decontamination of equipment, structures, soils				<u>Page 3</u>
I-1c(1)	Closure of containers	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(2)	Closure of tank systems	<u>N/A</u>	<u>          </u>	<u>          </u>	<u>Not in Permit</u>
I-1c(3)	Closure of waste piles	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(4)	Closure of surface impoundments	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(5)	Closure of incinerators	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(6)	Closure of land treatment facilities				<u>"</u>
I-1c(6)(a)	Continuance of treatment	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(6)(b)	Vegetative cover	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1c(7)	Closure of miscellaneous units	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1d	Closure of disposal units				<u>"</u>
I-1d(1)	Disposal impoundments				<u>"</u>
I-1d(1)(a)	Elimination of liquids	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1d(1)(b)	Waste stabilization	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1d(2)	Cover design	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>
I-1d(3)	Minimization of liquid migration	<u>"</u>	<u>          </u>	<u>          </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-1d(4)	Maintenance needs	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
I-1d(5)	Drainage and erosion	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-1d(6)	Settlement & subsidence	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-1d(7)	Cover permeability	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-1d(8)	Freeze/thaw effects	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-1e	Ancillary closure activities	<u>N</u>	<u>      </u>	<u>18</u>	<u>      </u>	<u>"</u>
I-1f	Schedule for closure	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Closure Plan Page 7</u>
I-1g	Extensions for closure time	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
I-1h	Certification of closure	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Closure Plan Page 1</u>
I-2	Post-closure plan					<u>Not in Permit</u>
I-2a	Inspection plan	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2b	Monitoring plan	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2c	Maintenance plan	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2d	Land treatment	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2e	Miscellaneous units	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2f	Post-closure security	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2g	Post-closure contact	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-2h	Post-closure certification	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-3	Post-closure notices	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Deed Notice</u>
I-4	Closure cost estimate	<u>Y</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Closure Plan Page 8</u>
I-5	Financial assurance mechanism for closure					<u>Closure Cost - Financial Assurance</u>
I-5a	Closure trust fund	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-5b	Surety bond					<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-5b(1)	Surety bond guaranteeing payment into a closure fund	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Closure Cost - Financial Assurance</u>
I-5b(2)	Surety bond guaranteeing performance of closure	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-5c	Closure letter of credit	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-5d	Closure insurance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-5e	Financial test and corporate guarantee for closure	<u>N</u>	<u>      </u>	<u>19</u>	<u>      </u>	<u>"</u>
I-5f	Use of multiple financial mechanisms	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-5g	Use of financial mechanism for multiple facilities	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-6	Post-closure cost estimate	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Post Closure Financial Assurance</u>
I-7	Financial assurance mechanism for post-closure care					<u>"</u>
I-7a	Post-closure trust fund	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7b	Surety bond					<u>"</u>
I-7b(1)	Surety bond guaranteeing payment into a post-closure trust fund	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7b(2)	Surety bond guaranteeing performance of post-closure care	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7c	Post-closure letter of credit	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7d	Post-closure insurance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7e	Financial test and corporate guarantee for post-closure care	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-7f	Use of multiple financial mechanisms	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>



		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-7g	Use of a financial mechanism for multiple facilities	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Post Closure Financial Assurance</u>
I-8	Liability requirements					<u>Sudden and Non-Sudden Insurance</u>
I-8a	Coverage for sudden accidental occurrences					<u>"</u>
I-8a(1)	Endorsement or certification	<u>N</u>	<u>      </u>	<u>20</u>	<u>      </u>	<u>"</u>
I-8a(2)	Financial test for liability coverage	<u>N/A</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-8a(3)	Use of multiple insurance mechanisms	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-8b	Coverage for nonsudden accidental occurrences					<u>"</u>
I-8b(1)	Endorsement or certification	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-8b(2)	Financial test for liability coverage	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-8b(3)	Use of multiple insurance mechanisms	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-8c	Request for variance	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>Not in Permit</u>
I-9	State mechanisms					<u>State Financial Mechanism</u>
I-9a	Use of state-required mechanism	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>
I-9b	State assumption of responsibility	<u>"</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>"</u>





		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS						
J-1	Solid waste management units	<u>N</u>	<u>          </u>	<u>21</u>	<u>          </u>	<u>Not in Permit</u>
J-1a	Characterize the solid waste management unit	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
J-1b	No solid waste management units	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
J-2	Releases					<u>"</u>
J-2a	Characterize releases	<u>"</u>	<u>          </u>	<u>22</u>	<u>          </u>	<u>"</u>
J-2b	No releases	<u>"</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>"</u>
K. OTHER FEDERAL LAWS		<u>"</u>	<u>          </u>	<u>23</u>	<u>          </u>	<u>"</u>
L. PART B CERTIFICATION		<u>Y</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>Certification</u> <u>Page</u>

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